ANNUAL REPORT

Monterey Regional Storm Water Management Program

November 15, 2008

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Appendices

ANNUAL REPORT

Check box if this is a new name, address, etc.

Permittee Information

1. Permittee (Agency Name): Monterey Regional Storm Water Permit Participants Group ☐
2. Contact Person: Robert Jaques, Program Manager ☐
3. Mailing Address: 5 Harris Court, Building D ☐
4. City, State and Zip Code: Monterey, CA 93940 ☐
5. Contact Phone Number: (831) 645-4607 ☐
6. WDID # : State Water Resources Control Board Water Quality Order No. 2003–0005–DWQ,

National Pollutant Discharge Elimination System (NPDES) General Permit No. CAS000004;

Adopted and approved via CCRWQCB Resolution No. R3-2006-0076 on September 7, 2006.

7. Have any areas been added to the MS4 due to annexation or other legal means? ☐ YES ☒ NO

If YES:

Outfall	Has map been updated?		Has SWMP been updated?		Receiving Water Name
	YES	NO	YES	NO	

8. Are you subject to the Design Standards contained in Attachment 4 of the General Permit?
☒ YES* ☐ NO

If yes, report on the implementation of the Design Standards in section D.5 of this Annual Report Form.

*Only for certain permittees, as discussed herein.

Reporting Period: September 9, 2007 to September 8, 2008

(Report is due by November 22 each year)

Executive Summary

This document comprises the annual reports required by the General Permit issued to the Monterey Regional Storm Water Permit Participants Group by the Regional Water Quality Control Board (RWQCB) on September 7, 2006. The Storm Water Management Program (SWMP) for each of these Permittees is the Monterey Regional Storm Water Management Program (MRSWMP) which was reviewed and approved by the RWQCB in conjunction with issuing permit coverage to the entities comprising this Group. The Permittees in this Group consist of the cities of Pacific Grove, Monterey, Seaside, Del Rey Oaks, Sand City, Marina, and the County of Monterey.

Subsequent to the issuance of permit coverage to these entities, the city of Carmel-by-the-Sea submitted to the RWQCB its Notice of Intent to be covered by the State Water Resources Control Board's (SWRCB's) General Permit. The RWQCB granted permit coverage to Carmel-by-the-Sea on May 2, 2008, and authorized it to join with these other entities by using the MRSWMP as its Storm Water Management Program. When it submitted its Notice of Intent, Carmel-by-the-Sea also submitted an addendum to the MRSWMP to incorporate specific information pertaining to its facilities and programs. Prior to being granted permit coverage Carmel-by-the-Sea had been taking the same steps and had been working to implement the same types of procedures and policies as the other Permittees, just as though it was already permitted and using the MRSWMP as its SWMP.

This Annual Report has been prepared in the format recommended by the SWRCB for NPDES Phase 2 storm water permittees to use in preparing their annual reports. It has been adapted only slightly to match the BMP and Measurable Goals matrix format used in the MRSWMP. It constitutes a single Annual Report that fulfills the annual reporting requirements for all of the Permittees.

This Executive Summary briefly covers all of the major sections of the annual report. In preparing this Executive Summary, the following series of questions, which were recommended by the SWRCB for use in preparing the Annual Report, were considered by all of the Permittees. The responses represent the collective input from all of the Permittees covered by the MRSWMP.

Question: How effective was your program at reducing pollutants in your storm water discharge?

Response: This is a difficult question to answer, as the term "effective" can have different meanings under different contexts. The question is answered in general terms below, with reference to each of the six Minimum Control Measures:

Minimum Control Measure No. 1 – Public Education and Outreach

We believe that our Program was very effective in educating the public about storm water pollution prevention issues. The educational component was presented in a variety of forms including print ads, brochures, posters, and hands-on experiences. The public was reached through a variety of venues including movie theater ads, print ads, bus ads, classroom

presentations, and informational booths at public events. The Program reached many different segments of the public, from young children to older adults, as described in detail in Appendix A. There has been a noticeable increase in public awareness. Some entities reported that they observed more residential car washing being done on soil areas where the water percolates rather than running off into the storm drainage system. It was also reported that more mobile washers were observed using proper BMPs to prevent storm water pollution. This is believed to be in part a result of the public education program of the MRSWMP.

Minimum Control Measure No. 2 – Public Involvement and Participation

We believe that our Program was very effective in involving the public in activities and events that were directly related to storm water pollution prevention measures. In these activities and events, a broad cross-section of the public participated in hands-on activities which helped to carry out the types of storm water pollution prevention messages that were presented under MCM No. 1. These are described in detail in Appendix B and in the Section of this Annual Report pertaining to MCM No. 2. One of the most direct indicators of the effectiveness of the MRSWMP are the results of the outfall monitoring work that is being conducted under this MCM. The Urban Watch and First Flush Monitoring Report contained in Appendix P provides a comparison of the monitoring results from the six years preceding Year 2 (the average of results from the period 2000 to 2006) and for Year 2 (2007-2008).

Results from the Year 2 Urban Watch and First Flush expanded monitoring program showed that:

Dry Run/First Flush (wet season):

- Nitrate concentrations were lower than previous years' averages and rarely exceed the water quality objective during wet weather.
- Orthophosphate concentrations reflected comparable values from previous years and usually exceeded the water quality objective.
- *E. coli* and enterrococcus were high everywhere; however, enterrococcus was not as high as in previous years.
- Most copper concentrations were lower than in previous years.
- Urea measurements were generally less than 1000 ppb.

Urban Watch (dry season):

- The Steinbeck Plaza drainage area in Monterey remained a problem during the dry season for bacteria, orthophosphate and detergents.
- The Greenwood Park drainage area in Pacific Grove had high bacteria levels and intermittently high hits of detergent.
- Trash is a problem at all Monterey Peninsula outfalls.
- Most of the Carmel outfalls, most of the new expanded Pacific Grove outfalls, and the Pajaro outfall were dry during the summer.

A trend analysis was performed on the data using a statistical analytical methodology. Only three outfalls were found to have produced data that indicated a significant trend with a high level of statistical confidence. These were the outfalls at:

1. The Monterey Library where copper was trending to lower levels,

2. The Twin 51 outfalls in Monterey where the *E. Coli* levels were trending higher, and
3. The Congress site in Pacific Grove where the orthophosphate levels were trending higher

Data from the other sites did not indicate any significant trends. It may be that it will take additional years of monitoring data before trends will become statistically apparent.

With regard to the cost information provided under BMP 2-2.d pertaining to the Urban Watch and First Flush monitoring programs, it should be noted that the citizen volunteers are not paid. However, the professional personnel that oversee and direct them are paid. In addition to these labor costs, there are significant costs for the sampling equipment, laboratory analyses, data interpretation, and report preparation. The total cost to carry out these two monitoring programs during Year 2 was $43,210. The program was funded as a Group activity on behalf of all of the co-permittees.

Some entities felt that the storm drain inlet stenciling program was effective both in terms of educating people to not put non-storm water discharges into the inlets, and also in getting the stenciling done via volunteers, rather than having to pay city staff to do this work. Other entities elected to perform the stenciling work using their own staff, based on their determination that this was more cost-effective than overseeing the stenciling work in their jurisdictions.

Minimum Control Measure No. 3 – Illicit Discharge Detection and Elimination

Work under this MCM was in the preliminary stages during the current reporting period. It included adopting and implementing storm water ordinances containing specific requirements pertaining to illicit connections and illegal discharges, encouraging the public as well as members of the permittee's staffs to report such activities, following up on such reports to correct these violations, and developing and implementing business inspection programs. Some entities reported that a moderate number of illicit connections and illegal discharges were reported or detected during the current reporting period, while others reported from none to very few such reports. The co-permittees will be discussing their procedures and experiences in detecting and following up on reports of these types of incidents in an effort to have a consistent approach being used throughout the MRSWMP area.

Minimum Control Measure No. 4 - Construction Site Storm Water Runoff Control

This MCM become effective beginning in Year 2, and the Ordinances adopted by the permittees establish the effective date for these ordinance provisions to be September 8, 2007. During the current reporting period we continued providing educational programs to alert and acquaint construction contractors with the Ordinance requirements pertaining to construction site storm water pollution prevention. However, it appears that the market for such presentations was nearly satisfied as a result of these presentations that were made during Year 1, and it was not possible to find enough contractor organizations to make these presentations to during Year 2 to reach the target number of attendees. Permittee staff members who are involved in site plan reviews and in construction inspection were provided the opportunity to receive refresher training on these requirements and in the use of the construction site inspection checklists and the BMP Guidance Series materials contained in the MRSWMP. Most of the entities reported that they have increased their surveillance of construction sites as a result of implementing the MRSWMP.

However, it has proven to be a challenge to integrate the detailed construction site plan review and inspection procedures, which are contained in the MRSWMP, into the standard operating procedures of each of the co-permittees.

Minimum Control Measure No. 5 – Post-Construction Storm Water Management in New Development and Redevelopment

The Program calls for this MCM to become effective in Permit Year 3, and the Ordinances adopted by the permittees establish the effective date for these ordinance provisions to be September 8, 2008. Accordingly, the Ordinances adopted by the permittees establish the effective date for these ordinance provisions to be September 8, 2008. To prepare for this MCM, during the Year 3, an educational program was held during Year 2 to alert and acquaint design professionals with the Ordinance requirements pertaining to post-construction storm water management in new development and redevelopment projects. Also during Year 2, permittee staff members who will be involved in plan reviews for the types of projects to which these requirements are applicable were provided training on these requirements and in the associated BMP Guidance Series materials contained in the MRSWMP. Permit Year 3 will provide the opportunity to begin assessing the process of implementing these measures into the design of new development and redevelopment projects to help prevent storm water pollution.

Minimum Control Measure No. 6 –Pollution Prevention/Good Housekeeping for Municipal Operations

We believe that the Program was very effective in improving the knowledge and sensitivity of the permittee's staffs in recognizing and preventing storm water pollution resulting from municipal operations. Some focused training sessions were held, and numerous inspections were conducted on a variety of types of municipal facilities to identify and correct sources of storm water pollution. It was rewarding to find from these inspections that relatively few instances of storm water pollution were occurring at municipal facilities. Those which were identified have either already been corrected, or are in the process of being corrected.

The effectiveness of these BMPs was assessed using the California Stormwater Quality Association's (CASQA) guidelines contained in the CASQA publication titled "Municipal Stormwater Program Effectiveness Guide." The individual BMP assessments are contained in the Section titled "Effectiveness Assessment."

Nearly all of the BMPs were found to be successful at Outcome Levels 1 and 2. Several were found to be successful at Outcome Level 3, and one was found to be successful at Outcome Level 4.

The following steps are being taken to revise the MRSWMP and to optimize BMP effectiveness, when the effectiveness assessment process identifies BMPs or programs that are ineffective or need improvement:

1. A review of each such BMP or program is made by the Program Manager to try to ascertain what is making it ineffective, or how it can be improved.
2. The results of this review are formally presented to the Management Committee which oversees the implementation of the MRSWMP, for discussion and action by that body.
3. The changes recommended by the Management Committee will be described in each

Year's Annual Report as proposed as modifications to the MRSWMP to be carried out in future years under heading "**v. Proposed Modifications."**

Question: Were you in compliance with the General Permit?

Response: With the following exceptions, yes. The two principle areas of noncompliance were in the adoption of stormwater ordinances by two of the permittees (the County of Monterey and the City of Marina) and in getting all of the appropriate personnel to attend training sessions under MCMs 5 and 6. While these two entities have not yet adopted stormwater ordinances, for reasons which are detailed in the respective Appendices for these entities, these entities have existing ordinances and laws in place for grading activities and discharges to waterways that are protective of water quality. These entities anticipate that they will have their stormwater ordinances adopted in Permit Year 3. Having all personnel available to attend Group training sessions has sometimes been difficult, due to factors such as unpredictable changes in workload, e.g. emergency repair or maintenance assignments, sickness, vacations, and internal dissemination of the information regarding the training session schedules and who should attend them. Some of the training programs will be repeated in the future to give those personnel who could not attend the earlier sessions another opportunity to attend.

Question: What was the most successful part of the program?

Response: The permittees felt that the public education and public involvement components of the Program under MCMs No. 1 and 2 were the most successful. It was gratifying to find significant improvement in public awareness and understanding of storm water pollution prevention issues that were the direct result of these efforts. The permittees also felt that the business inspections performed under MCM 3 were raising awareness regarding storm water pollution prevention within the business community, and they were pleased to find that most of the inspections were finding that the businesses were using the proper BMPs to prevent such pollution.

The permittees also felt that the training and inspections performed under MCM No. 6 were successful in building an increased level of storm water pollution awareness and understanding among their own staffs, and that this had been effective in eliminating nearly all sources of storm water pollution from public facilities.

Question: What was the most challenging?

Response: The most challenging part of the Program for all of the permittees was in coordinating and tracking the efforts of multiple departments within each entity's organizational structure. These departments typically included Public Works, Building, Construction Management, Parks, Fire, and Police. Building an internal awareness of storm water pollution prevention issues, ordinance requirements, tracking and reporting requirements, and coordinating the work of these various departments continued to be a significant challenge for most of the permittees, particularly as additional BMPs were implemented. There is also a substantial

amount of additional paperwork that must be prepared in order to carry out the BMPs and to document them. This adds to the workload, and there is a natural resistance to this in many members of the staff, in part due to the fact that budget impacts have caused many of the permittees to operate with fewer staff members than they had in the past.

Minimum Control Measures

The Monterey Regional Storm Water Management Program (MRSWMP) is divided into these six Minimum Control Measures:

1. Public Education and Outreach
2. Public Involvement and Participation
3. Illicit Discharge Detection and Elimination
4. Construction Site Stormwater Control
5. Post-Construction Stormwater Management
6. Pollution Prevention and Good Housekeeping for Municipal Operations

Under each of these Minimum Control Measures is a set of Best Management Practices (BMPs) and Measurable Goals that describes the work that being undertaken to carry out the MRSWMP.

This Section reports on the status and effectiveness of those BMPs and Measurable Goals that were performed during the current Reporting Period (Permit Year 1). Under each Minimum Control Measure, the BMP Descriptions, BMP numbers, Implementation Plans, Measurable Goal numbers, and Measurable Goal Descriptions are all taken directly from the MRSWMP.

1. PUBLIC EDUCATION AND OUTREACH

Status of BMPs and Implementation Plans

BMP Description	*BMP No.*	*Implementation Plan*	*Status*					
			Implemented	Not Applicable	Modified	Effective	Unknown	Not Effective
Educate an audience that includes students, business owners, particularly those in targeted businesses and tourists as well as residents about the causes of storm water pollution and the things they can do to reduce this pollution. (See pages E-1 through E-22 of Appendix E of the MRSWMP for the Public Education and Outreach Program)	1-1.b	Review & revise "Year 1 Public Education & Outreach Plan" to maximize efficiency in audiences reached, and address current contaminants impacting water quality. Changes will be based on input from the public, volunteer monitoring network data, and contaminants of concern. The revised Plans will be implemented in each of Years 2 through 5.	X			X		

a. BMPs

i. General Summary

The success of the BMPs under this MCM is described in Appendix A.

ii. Status of Measurable Goals

BMP No.	*Measurable Goal*	*Measurable Goal Met by all Permittees, unless otherwise noted in the "Comments" column*	*Measurable Goal Not Met*	*Comments*
1-1.b	The updated Measurable Goals for Year 2 are too extensive to list in this table, and are instead listed in the materials contained in Appendix A.	X		This Measurable Goal was fulfilled under the Public Education and Public Outreach Program described in Appendix A. A summary of the stenciling work that was performed under MCM 1 is included in Appendix B, because stenciling was performed under both MCM 1 and MCM 2.

iii. Appropriateness

The appropriateness of the BMPs under this MCM is described in Appendix A.

iv. Effectiveness

The effectiveness of the BMPs under this MCM is described in general terms in Appendix A and in detail in the Section titled "Effectiveness Assessment."

v. Proposed Modifications

The proposed modifications to certain activities proposed in the original Public Education and Public Outreach Program contained in the approved MRSWMP, along with a justification for each, are as follows:

With regard to Item 1.3 Grades 9-College-stenciling: Because it has been found that there are elementary school children who want to obtain community service credit at lower grade levels it was proposed that beginning in Permit Year 2 the age range for this activity should be expanded to go down to fourth grade and up to college. This modified approach will be continued in Year 3.

With regard to Item 1.4 Teacher Training: SEA has tried unsuccessfully to offer teacher trainings for the school districts in the last 2 years. All three school districts were contacted one or more times, but not one district has agreed to any formal teacher trainings. Based on public comments received at the 2nd Annual Public Workshop (November 3, 2008) the Public Education and Outreach Program Coordinator will contact other organizations that have sought successfully to provide teacher training, to see if they can provide any ideas or assistance in accomplishing this. If this proves unsuccessful, in Year 3 the SEA education coordinator will contact the three school district Regional Occupational Program Coordinators to provide outreach for the ROP classes associated with hospitality, auto repair, or other business related courses that may influence stormwater pollution. SEA will offer presentations, educational materials and surveys to participants. The survey responses will help measure effectiveness of this outreach tool.

With regard to Item 4 Residential Outreach: It was found that for various reasons some of the cities who had been listed in the MRSWMP as planning to publish and distribute newsletters during Year One were unable to do so, while some others were preparing to publish and distribute newsletters. Therefore, it was proposed that beginning in Permit Year 2 the language would simply state that some of the Permittees would provide residential outreach information in their newsletters. This modified approach will be continued in Year 3.

With regard to Item 8 Restaurant Outreach: It has been nearly impossible to schedule restaurant outreach visits that allow for the training video to be shown and for pre- and post-testing of restaurant employees to be conducted, because restaurant owners and managers do not wish to take their employees' time for this purpose. Also, the Ecology Action BWET grant that provided the staff for the 75 restaurant visits during Year One was a one-time grant and will not be available in future Years. For these reasons it was proposed beginning in Permit Year 2 to revise the language in the restaurant training section of the Public Education and Public Outreach Program to state that 75 restaurants would be provided the video training program and educational posters, and that the individual Permittees would provide direct encouragement through methods such as letters to the restaurants in their jurisdictions, or oral requests made during business inspections, to provide this training to their staff. In addition the California Restaurant Association would be contacted to solicit their support and encouragement for this, and efforts will be made to promote the Green Business program to restaurant owners. This modified approach will be continued in Year 3. In addition the restaurant outreach program is being expanded to include the Green Business program, as described in paragraph 8. "Restaurant Training" in this Appendix.

With regard to Item 17 Tourist Outreach: Getting the PSA into the hotel circuit has not been successful. Tourist Outreach will be revised to include the permittee Group's partnering with Monterey Bay Aquarium on their bilingual outdoor theatre program for tourists. The Group is paying $7,500 toward this summer outreach program. The measurable goal for this activity will be calculated by the numbers of brochures distributed in visitor centers and results from MBA surveys on the tourist outreach program.

b. Presentation of the results of information collected and analyzed, if any, during the

reporting period, including any monitoring data used to assess the success of the program at reducing the discharge of pollutants to the MEP.

All of the information pertaining to this Minimum Control Measure is contained in Appendix A.

In preparing this section of the Annual Report the following questions pertinent to this Minimum Control Measure were considered, and the responses to each of them are presented.

Question: Have you or are you planning to provide storm water education and outreach material in multiple languages?
Response: Yes. Many of the educational and outreach materials are presented in both English and Spanish, which are the two predominant languages spoken within the MRSWMP area.

Question: Are certain community demographics more receptive to environmental issues? How might you reach out to those that do not appear to be as receptive?
Response: Yes. At least in some communities there appear to be differences in receptiveness depending in part on economic status and national origin. We reach out to different community demographics by adapting school programs to the communities within which the schools are located, and by providing educational materials at public events and activities that are well attended within these communities.

Question: What types of business outreach activities have been conducted?
Response: Outreach has been conducted to restaurants through the distribution of educational videos and posters, and to construction contractors through BMP informational brochures and educational presentations. Beginning in Permit Year 2 this outreach was extended through business inspections to gas stations and vehicle service facilities. In addition, during Year 2 the first of two public Workshops was focused on commercial washing businesses, as described more fully in Appendix L and under BMP 2-1.d in this Section.

Question: What percentage of the population do you estimate you have reached with your different types of outreach?
Response: Refer to Appendix A for a discussion of this topic.

Question: How much time is dedicated to public inquires and requests for additional information?
Response: One of the duties of the Public Education and Public Outreach Program Coordinator, under her contract with the Permittees, is responding to public inquiries and requests for additional information. During the current reporting period, a substantial amount of time was spent by the Coordinator performing these duties. It was not practical to track the actual amount of hours spent doing this. For this reason only a small amount of time has been required by the Permittee staffs in responding to such requests, because the bulk of them have to date been directed to the Coordinator whose contact information is displayed on the educational materials that have been distributed.

Question: Has awareness regarding storm water pollution increased in your community? How was this measured?
Response: Yes. This was measured through surveys of public awareness, as discussed in Appendix A.

Question: How did you seek survey participation? Was it difficult to get enough participants?
Response: Surveys were conducted at various public events and through pre- and post-testing of students in educational programs. A reasonable number of survey responses were obtained to assess whether or not awareness was increasing.

Question: Has the program led to or will it lead to behavioral changes? How is this evaluated?
Response: Behavioral changes have already been noticed and reported. Permittee storm water program managers have observed a heightened level of awareness and sensitivity to storm water pollution prevention issues within their organizations, both through comments made and actions taken by members of their staffs. Behavioral changes in members of the public have been similarly observed by the Public Education and Public Outreach Program Coordinator at public outreach events.

c. Brief summary of the storm water activities planned to be undertaken during the next reporting cycle, along with an implementation schedule, and justification for any proposed activities that differ from those originally proposed in the approved MRSWMP.

The activities under this MCM that will be carried out during Year 3 are summarized in the following table, and certain of these are also described in more detail in Appendix A. The proposed modifications to certain activities proposed in the original Public Education and Public Outreach Program contained in the approved MRSWMP, along with a justification for each, were provided in paragraph a.v of this Section.

BMP Description	BMP No.	Implementation Plan	Proposed Measurable Goal	Modified?		Schedule	
				YES	NO	Complete this year	Ongoing Implementation
Educate an audience that includes students, business owners, particularly those in targeted businesses and tourists as well as residents about the causes of storm water pollution and the things they can do to reduce this pollution. (See pages E-1 through E-22 of Appendix E of the MRSWMP for the Public Education and Outreach Program)	1-1.b	Review & revise "Year 1 Public Education & Outreach Plan" to maximize efficiency in audiences reached, and address current contaminants impacting water quality. Changes will be based on input from the public, volunteer monitoring network data, and contaminants of concern. The revised Plans will be implemented in each of Years 2 through 5.	The updated Measurable Goals will be included each year in the revised Public Education and Outreach Program, which will be submitted as part of the Annual Reports	X*			X

*Only to the extent described in paragraph a.v in this Section.

2. PUBLIC INVOLVEMENT AND PARTICIPATION

Status of BMPs and Implementation Plans

BMP Description	*BMP No.*	*Implementation Plan*	*Status*					
			Implemented	Not Applicable	Modified	Effective	Unknown	Not Effective
Encourage general public participation in programs and activities designed to promote understanding and awareness of storm water pollution, such as cleanup events and restoration activities. (See pages E-23 through E-29 of Appendix E of the MRSWMP for the Public Participation and Involvement Program)	2-1.a	Draft annual report will be posted on the website and in city offices for review by public one month prior to Annual Workshop No. 2	X			X		
	2-1.c	Hold Annual Workshop #2 annually in early November prior to Annual Report submission to explain the Phase II Permit objectives and solicit public input on the success of the current BMPs and Measurable Goals.	X			X		
	2-1.d	Hold Annual Workshop #1 annually in Mar-April: Workshop #1 in Years 2-5 will focus on a specific target audience and associated contaminants of concern. Topic/audience will be chosen each year based on historical contaminants of concern for industries common to permit jurisdiction area, volunteer monitoring network data, and topic/audience not chosen the prior year. Priority will be given to the Inventory of Businesses to be Inspected contained on pages E-37 through E-65 of Appendix E.	X			X		
	2-2.a	Provide financial sponsorship support for Annual Coastal Cleanup Day in Monterey County or other local beach clean up efforts.	X			X		
	2-2.b	Recruit volunteers through municipal employee base and through advertising for Annual Coastal Clean Up Day or other local clean up efforts.	X			X		
	2-2.c	Provide support for, or assistance with, storm drain stenciling through providing supplies, volunteer recruitment, and staff labor.	X			X		

BMP Description	*BMP No.*	*Implementation Plan*	*Status*					
			Implemented	Not Applicable	Modified	Effective	Unknown	Not Effective
	2-2.d	Provide financial support for, or assistance with, volunteer monitoring programs and public participation events such as: Urban Watch, First Flush, Snapshot Day, and Walk N' Talk Days	X			X		
		Prioritize Pollutants of Concern (see subheading titled "Conclusions" on page 4-13) from Urban Watch and First Flush data; conduct source tracking using upstream monitoring for highest priority pollutants and use this to identify probable sources; inspect these sources under Minimum Control Measure No. 3 and take appropriate corrective actions in accordance with BMPs 3-3.d and 3-4.a	X			X		
Encourage general public participation in programs and activities designed to promote understanding and awareness of storm water pollution, such as cleanup events and restoration activities. (See pages E-23 through E-29 of Appendix E of the MRSWMP for the Public Participation	2-2.d (Cont'd)	Within the MRSWMP area the First Flush and Urban Watch monitoring programs will be expanded to include the following: Outfalls which receive drainage from commercial, industrial, or residential areas which meet the following criteria: (1) Are over 18" in diameter, and (2) Are safe for volunteers/staff to access, including those that discharge to a 303(d) listed water body. Conduct monitoring on these additional outfalls for a similar set of constituents as are monitored under the Urban Watch and First Flush Programs. Monterey County will focus on 303(d) listed water bodies in Year 2, and will expand into the other water bodies over the remaining permit term.	X			X		

BMP Description	*BMP No.*	*Implementation Plan*	*Status*					
			Implemented	Not Applicable	Modified	Effective	Unknown	Not Effective
and Involvement Program)		Based on existing scientific studies and data, the MRSWMP Group will implement a pollution reduction component that identifies with specificity the geographic areas within the jurisdiction of each municipality that are sources of pollution, including T. Gondii and other pathogens, impacting California sea otters. Once the geographic areas are identified the MRSWMP group will create and implement a program to reduce and eliminate the sources of pollution identified as impacting sea otters.	X			X		
Become an active participant in the Citizen Water Quality Monitoring Network (See pages E-23 through E-29 of Appendix E of the MRSWMP for the Public Participation and Involvement Program)	2-3.a	A representative from the MRSWMP group will become an active participant in the Citizen Water Quality Monitoring Network.	X			X		

a. BMPs

i. General Summary

All of the BMPs in this Section were successful in involving the public in activities associated with storm water pollution prevention. The broadness of the programs and the various segments of the population to which they appealed, provided the opportunity for a wide cross-section of the community to learn about, and participate in meaningful activities directed at mitigating or eliminating sources of, storm water pollution. More detail on certain of these BMPs is contained in Appendix B.

ii. Status of Measurable Goals

BMP No.	*Measurable Goal*	*Measurable Goal Met by all Permittees, unless otherwise noted in the "Comments" column*	*Measurable Goal Not Met*	*Comments*
2-1.a	All written public comments submitted and notes taken at workshop will be considered for inclusion in the annual report and kept on file.	X		The public comments from the two public workshops conducted during Permit Year 2 have been considered in preparing this Annual Report and in proposing the revisions to the BMPs described herein. These comments are discussed in Appendix B. With regard to making the Annual Report for Year 2 available for public review prior to the Public Workshop held under BMP 2-1.c, the RWQCB was contacted to ask if the report could be made available electronically for online public review, rather than in hard copy form at local city halls and libraries. On August 28, 2008 the RWQCB (Mr. Innis) provided the following response to that request: *"I think that is totally acceptable. I find no requirements to place the ARs in libraries or City Hall (it was a good idea) in the MRSWMP. An executive summary placed in the same locations as before would serve two functions to let interested patrons know the overall status and provide a web link if they want more detail."* Therefore, in Year 2 the Annual Report was made available for online public review, not in hard copy fashion.

BMP No.	*Measurable Goal*	*Measurable Goal Met by all Permittees, unless otherwise noted in the "Comments" column*	*Measurable Goal Not Met*	*Comments*
2-1.c	40 participants per workshop		X	Workshop No. 2 was intended for the public in general, and was focused on presenting the findings, conclusions, and recommendations contained in the Draft Year 2 Annual Report. For the Workshop held on November 5, 2007 during Year 1, the local cable television channel called Access Monterey Peninsula (AMP) taped the workshop, referred to on AMP as the "Monterey Regional Storm Water Management Program Meeting," and aired the program 68 times on AMP from January 2008-August 2008. It aired the following number of times during these months: 19 times in January 2008, 23 times in February2008, 7 times in March 2008, 4 times in April 2008, 5 times in May 2008, 4 times in June 2008, 3 times in July 2008, and 3 times in August 2008. The meeting was also made available for downloading from www.ampmedia.org. This Workshop was broadcast repeatedly over a multi-week period on Access Monterey Peninsula public television, which has a large viewing audience. Therefore, far more than 40 citizens were able to see and hear the workshop in its entirety. This provided them information on how they could monitor the work of the MRSWMP through the MRSWMP's website, and how they could contact the appropriate representatives of their entities in order to raise any

BMP No.	*Measurable Goal*	*Measurable Goal Met by all Permittees, unless otherwise noted in the "Comments" column*	*Measurable Goal Not Met*	*Comments*
2-1.c (Cont'd)	40 participants per workshop		X	issues of concern or to obtain further information on any of the MRSWMP activities. To see if public participation in the Workshop could be improved by altering the time-of-day and the forum, the second Public Workshop for Year 2 (to present the Year 2 Annual Report) was held on November 3, 2008 during the noon hour, again at the Monterey City Council Chambers which is readily accessible to public transportation and is located in the heart of Monterey. Light food and beverages were provided free-of-charge to the public attending the Workshop. The Workshop was again covered by AMP. The Workshop was also recorded on a video camera, and was then posted on the SEA Website as a pod cast, so members of the public who could not attend the Workshop in person could view it in its entirety on their home computers. To allow these members of the public to provide their input, an email address was provided to which they could send their comments and suggestions, so they could be received and considered in finalizing the Report prior to submitting it to the RWQCB. As was done for the Annual Report Workshop in Year 1, extensive public advertising was done to encourage the public to attend this Workshop.

BMP No.	***Measurable Goal***	***Measurable Goal Met by all Permittees, unless otherwise noted in the "Comments" column***	***Measurable Goal Not Met***	***Comments***
2-1.c (Cont'd)	40 participants per workshop		X	As a result of making these changes 16 members of the public attended the workshop in person. Several of them offered public comments, which are described in Appendix B. No members of the public submitted questions/suggestions via email.
2-1.d	40 participants per workshop		X	The Workshop was held, but the Measurable Goal of having 40 participants was not achieved. Workshop No. 1 was focused on Commercial Washers. An invitation to attend the Workshop was mailed directly to over 800 businesses that were considered to potentially be Commercial Washers, and public notices were placed in local newspapers. A copy of the workshop materials that were mailed out, along with the display ads in the Coast Weekly and the Carmel Pinecone that were, used to publicize the workshop, are contained in Appendix B. The Commercial Washers Workshop, which constitutes Workshop No. 1 under BMP 2-1.d for Year 2, was held on the evening of Wednesday, April 16, 2008 in the City of Seaside's Oldemeyer Center. The Workshop ended at approximately 7:00 p.m. Attending on behalf of the MRSWMP Group were Ms. Krafft, Mr. Reeves, Mr. Quattlebaum, Mr. Lundegard, Mr. Hanson, Mr. Leggett, Ms. Sidenstecker, and Mr. Jaques.

BMP No.	*Measurable Goal*	*Measurable Goal Met by all Permittees, unless otherwise noted in the "Comments" column*	*Measurable Goal Not Met*	*Comments*
2-1.d (Cont'd)	40 participants per workshop		X	Representatives from other agencies included Ms. Harris of MRWPCA, Mr. von Dohren of CAWD, and Mr. Ricker of the City of Salinas. Fifteen individuals who own, or work in, businesses in one or more of the Commercial Washer categories attended the Workshop. Materials were handed out containing information describing the Proposed Approach to Managing the Discharges from Commercial Washers, (including the tri-fold brochure in Attachment 5 to this Appendix B) which the Management Committee approved at its last meeting. A PowerPoint presentation was made providing an overview of the storm water regulations, how these affect Commercial Washers, and the Proposed Approach to Managing these Discharges. The presentation and the materials seemed to be well received by the audience. There were numerous questions and answers, clarifications, and discussion. More information on this Workshop is included in Appendix B.

BMP No.	***Measurable Goal***	***Measurable Goal Met by all Permittees, unless otherwise noted in the "Comments" column***	***Measurable Goal Not Met***	***Comments***
2-2.a	Annual financial sponsorship of up to $500 to cover expenses not covered by sponsors.	X		A check in the amount of $500 was sent to the California State Department of Parks and Recreation, the sponsor of this event, on May 24, 2008 to fulfill this Measurable Goal.
	Provide staffing that amounts to 40 hours for coordinating this event.	X		Between the time spent publicizing the event to recruit volunteers and the manpower, vehicles, and other assistance provided on the actual day of the event, the Permittees collectively provided well in excess of the 40 hours of time they committed to provide
2-2.b	Each permit holder to recruit volunteers through two separate agency channels; e.g. email, paycheck stuffers, internal newsletters, etc. Track recruitment efforts, coordination support and financial support, and track number of participants and volume of waste collected and report this information in the Annual Reports for the indicated years.	X		Information on each individual co-permittee regarding this Measurable Goal is included in the Appendices.
	Air radio advertising before the event to encourage public participation	X		This Measurable Goal was fulfilled under the Public Participation and Public Involvement Program described in Appendix B.
2-2.c	Explore additional partnerships and encourage civic organizations to adopt storm drains to maintain.	X		The work of volunteers started in Year 1, as reported in the Year 1 Annual Report, continued in Year 2. These volunteers worked under the direction of "Save the Whales" personnel. During Year 2 new stenciling partnerships were developed with the Monterey Bay Aquarium and with Recreational Equipment Inc., in Marina.

BMP No.	***Measurable Goal***	***Measurable Goal Met by all Permittees, unless otherwise noted in the "Comments" column***	***Measurable Goal Not Met***	***Comments***
2-2.c (Cont'd)	Provide stenciling equipment, supplies, and maps of inlets to be stenciled, and complete a minimum of 300 drains and tabulate areas stenciled. Percent of all entities completed per year will be approximately 5-10%.	X		During the current reporting period, 380 inlets were stenciled throughout the area covered by the MRSWMP. A summary of the stenciling work that was performed in included in Appendix B. Information on each individual co-permittee regarding this Measurable Goal is included in the individual entity Appendices.
2-2.d	Provide $13,000 annual contribution for Urban Watch for professional staffing, equipment, lab analysis, and report writing.	X		This Measurable Goal was fulfilled on behalf of all of the co-permittees through a contract in the amount of $43,210 with the Monterey Bay Sanctuary Foundation Citizen Watershed Monitoring Network. Under that contract Urban Watch monitoring was performed on outfalls throughout the MRSWMP area. More detail on this is provided in Appendix B
	Provide $1,500 annually for Urban Watch for print ads to recruit volunteers.	X		This Measurable Goal was fulfilled under the Public Participation and Public Involvement Program and is described in Appendix B.

BMP No.	*Measurable Goal*	*Measurable Goal Met by all Permittees, unless otherwise noted in the "Comments" column*	*Measurable Goal Not Met*	*Comments*
2-2.d (cont'd)	Provide $3,000 annual contribution for First Flush for professional staffing, equipment, lab analysis, and report writing.	X		This Measurable Goal was fulfilled on behalf of all of the co-permittees through a contract in the amount of $43,210 with the Monterey Bay Sanctuary Foundation Citizen Watershed Monitoring Network. Under that contract First Flush monitoring was performed on outfalls throughout the MRSWMP area. More detail on this is provided in Appendix B
	Purchase $7,000 annually for radio ads to promote participation in First Flush	X		This Measurable Goal was fulfilled under the Public Education and Public Outreach Program and is described in Program Activity/Target No. 9 of Appendix A.
	Provide $1,500 annually for First Flush for print ads to recruit volunteers.	X		This Measurable Goal was fulfilled under the Public Education and Public Outreach Program and is described in Program Activity/Target No.12 of Appendix A.
	Provide $1,000 annual contribution for Snapshot Day for professional staffing, equipment, lab analysis, and report writing.	X		A check in the amount of $1,300 was sent to the Monterey Bay Sanctuary Foundation, the sponsor of this event, on April 24, 2008 to fulfill this Measurable Goal and the Measurable Goal (below) pertaining to providing support for the Walk N' Talk program.
	Provide $500 annually for Snap Shot Day for print ads to recruit volunteers.	X		This Measurable Goal was fulfilled under the Public Education and Public Outreach Program and is described in Program Activity/Target No.12 of Appendix A.

BMP No.	*Measurable Goal*	*Measurable Goal Met by all Permittees, unless otherwise noted in the "Comments" column*	*Measurable Goal Not Met*	*Comments*
2-2.d (cont'd)	Provide $300 to $500 annually for Walk N' Talk to garner public participation and a co-host representative for each event.	X		A check in the amount of $1,300 was sent to the Monterey Bay Sanctuary Foundation, the sponsor of this event, on April 24, 2008 to fulfill this Measurable Goal and the Measurable Goal (above) pertaining to providing support for Snapshot Day. On September 25, 2007 a "Backyard to Bay" Walk n Talk event was held outside of the Monterey Bay Aquarium (MBA) that focused on preparing households for the First Flush. Anna Holden and Bridget Hoover, both with the Monterey Bay National Marine Sanctuary (MBNMS) spoke to over 200 people during a three hour period about storing chemicals properly, picking up pet waste, and the flow of pollutants in a watershed. On September 6, 2008 another "Backyard to Bay" event was held outside the members' entrance to the Monterey Bay Aquarium. This event reached 61 people, and the theme was "Preparing for First Flush." Watershed basics were also discussed.

BMP No.	*Measurable Goal*	*Measurable Goal Met by all Permittees, unless otherwise noted in the "Comments" column*	*Measurable Goal Not Met*	*Comments*
2-2.d (cont'd)	Provide $300 to $500 annually for Walk N' Talk to garner public participation and a co-host representative for each event.	X		On Wednesday June 18, 2008 Lisa Emanuelson (representative of the Monterey Bay National Marine Sanctuary) and Maris Sidenstecker (the Group's Public Education and Public Outreach Program Coordinator) led a Walk N' Talk in Monterey from 9:00 a.m. to noon. The five participants included parents and one staff member from the Monterey Bay Aquarium's (MBA) Student Guide Program. This was a pilot program requested by MBA in order to engage family members of student guides in community activities. Ms. Emanuelson gave an over view of the Sanctuary and its programs and answered questions. Ms. Sidenstecker took the group to a storm drain outfall to discuss the volunteer monitoring programs and had participants use monitoring equipment to take some samples. The group concluded their outing with stenciling a few storm drain inlets on their way back to MBA. Co-hosting information is also reported on in some of the individual co-permittee appendices.

BMP No.	*Measurable Goal*	*Measurable Goal Met by all Permittees, unless otherwise noted in the "Comments" column*	*Measurable Goal Not Met*	*Comments*
2-2.d (cont'd)	In each of the indicated years perform source tracking on the two highest priority pollutants of concern on a minimum of one outfall, and report on findings and actions taken in the Annual Reports for each of the indicated years.	X		By evaluating the First Flush and Urban Watch reports from preceding years, in conjunction with representatives of the Monterey Bay National Marine Sanctuary, the Group concluded that the two highest priority pollutants of concern were E. Coliform and orthophosphate. A work plan to conduct source tracking on these parameters in the outfall having the highest reported concentrations of these constituents, the Steinbeck Plaza outfall in Monterey, was developed. The source tracking work was carried out in May 2008. Three possible contributors to these constituents were identified through the source tracking. These were the Monterey Animal Hospital, the Case de Amigos Animal Hotel, and Willy's Smokehouse. Efforts to determine whether or not these were the actual sources of these pollutants are still in progress. The investigative work conducted to date indicates that neither the Monterey Animal Hospital nor the Case de Amigos Animal Hotel are the sources of these pollutants. Initial investigative findings also indicate that Willy's Smokehouse is unlikely to be a source of these pollutants, although that investigation is still in progress. However, other sources are now being investigated as a result of having conducted this source tracking. The results of this ongoing

BMP No.	*Measurable Goal*	*Measurable Goal Met by all Permittees, unless otherwise noted in the "Comments" column*	*Measurable Goal Not Met*	*Comments*
2-2.d (cont'd)	In each of the indicated years perform source tracking on the two highest priority pollutants of concern on a minimum of one outfall, and report on findings and actions taken in the Annual Reports for each of the indicated years.	X		investigation will be reported on in the Year 3 Annual Report. When sources of these pollutants have been verified, the City of Monterey will work with the involved business owners to keep these pollutants out of their discharges to the storm drainage system. The work plan and the source tracking results are contained in Appendix N.
2-2.d (cont'd)	A minimum of 25% of all outfalls within the MRSWMP area will be monitored four times a year in each of the indicated years. Representative samples will be collected to account for seasonal variation. The results will be included in the Annual Reports for those years.	X		This Measurable Goal was fulfilled on behalf of all of the co-permittees through a contract in the amount of $43,210 with the Monterey Bay Sanctuary Foundation Citizen Watershed Monitoring Network. Under that contract Urban Watch and First Flush monitoring was performed on outfalls throughout the MRSWMP area. A copy of the contract listing the outfalls that were monitored and the scope of the monitoring work is contained in Appendix B. Those outfalls that met the criteria for monitoring established under the Implementation Plan for this BMP were included in this monitoring work. The outfalls covered by the monitoring work described above fulfill the 25% Measurable Goal for this BMP. The results of the monitoring work are provided in Appendix P.

BMP No.	*Measurable Goal*	*Measurable Goal Met by all Permittees, unless otherwise noted in the "Comments" column*	*Measurable Goal Not Met*	*Comments*
2-2.d (cont'd)	Year 1: Based on existing scientific studies and data identify with specificity the geographic areas within the jurisdiction of each municipality that are sources of pollution, including T. Gondii, and other pathogens, impacting California sea otters and results included in the Annual Report; Year 2: Create and implement a program to reduce and eliminate the sources of pollution identified as impacting sea otters. The program and implementation will be described in the Annual Report	X		The report fulfilling the Year 1 Measurable Goal for this BMP was contained in Appendix M of the Year 1 Annual Report. However, as noted in the letter received from The Otter Project's Executive Director contained in Appendix O, the scientific community is now of the opinion that the impact of storm water discharges on Sea Otter health and mortality is not nearly as significant as previously thought. For this reason the Recommended Program to address this issue, as contained on page M-11 of the Year 1 Annual Report and included for reference in Appendix O, was modified as described in Appendix O to reflect this.

BMP No.	*Measurable Goal*	*Measurable Goal Met by all Permittees, unless otherwise noted in the "Comments" column*	*Measurable Goal Not Met*	*Comments*
2-3.a	100% of monitoring network meetings to be attended annually by member of MRSWMP group.	X		The two meetings of the Citizens Watershed Monitoring Network held during Year 2 were attended by Ms. Elizabeth Krafft representing the MRSWMP Group. Copies of the agendas for these meetings are contained in Appendix B. No meeting minutes from these meetings were published. In addition the Monterey Bay National Marine Sanctuary representative, who regularly attends the MRSWMP's Management Committee meetings, offered to serve as the Management Committee's representative to these meetings in the event a member of the Management Committee is unable to attend. This will ensure there is continuity of coverage at these meetings.

iii. Appropriateness

All of the BMPs under this MCM were considered to be appropriate for achieving the objective of involving the public in activities that provided education pertaining to storm water pollution prevention. The activities also provided the public with hands-on opportunities to perform actual work that helped to reduce or eliminate sources of storm water pollution, and to mitigate the impacts of such pollution.

iv. Effectiveness

All of the BMPs under this MCM were considered to be effective in achieving the objective of involving the public in activities that provided education pertaining to storm water pollution prevention. The activities also provided the public with hands-on opportunities to perform actual work that helped to reduce or eliminate sources of storm water pollution, and to mitigate the impacts of such pollution.

The effectiveness of the BMPs under this MCM is described in the Section titled "Effectiveness Assessment."

v. Proposed Modifications

BMP 2-1.c: For the second Public Workshop presented during Year 1, which was intended to give the public the opportunity to learn about, and provide input into, the Year 1 Annual Report, the Group expended approximately $4,000 between advertising and direct staff labor. This is a significant expenditure for a single BMP, and even with this significant effort there was only a meager live turnout for the Workshop. The Workshop received extensive airing on Access Monterey Peninsula (AMP), which undoubtedly reached a number of additional members of the public. However, through television it is not possible for the public to ask questions or interact directly with members of the Management Committee.

To see if public participation in the Workshop could be improved by altering the time-of-day and the forum, the second Public Workshop in Year 2 was held during the noon hour, again at the Monterey City Council Chambers which is readily accessible to public transportation and is located in the heart of Monterey. Light food and beverages were provided free-of-charge to the public attending the Workshop. The Workshop was recorded on a video camera, and was then posted on the AMP Website as a pod cast, so members of the public who could not attend the Workshop in person could view it in its entirety on their home computers. To allow these members of the public to provide their input, an email address was provided to which they could send their comments and suggestions. As a result of these changes, attendance was somewhat improved over Year 1, as reported under this BMP in this Annual Report.

Since it is impossible to control the number of people and/or business representatives who will attend these Workshops (both the first and second Workshops of each Permit Year), the Measurable Goals for these Workshops will be changed, beginning in Year 3 from "40 Participants per Workshop" to "Workshop advertised in print media and on SEA Website, and pod cast with an invitation for non-attending public to submit questions and comments via email."

BMP 2-2.d: It has proven to be impossible to track recruitment efforts for Coastal Cleanup Day on an individual entity basis, and to try to estimate the number of participants generated by each entity's recruitment efforts, and the amount of waste collected by participants from each entity. However, the State Department of Parks provides such a report at the end of each event. For this reason the Measurable Goal for this part of BMP 2-2.d will be revised to read:

> "*Each permit holder to recruit volunteers through two separate agency channels; e.g. email, paycheck stuffers, internal newsletters, etc. Include in the Annual Report a tabulation of the total number of participants in the event and the total amount of waste collected.*"

BMP 2-2.d: The amount of money to be provided for radio advertising to promote participation in the First Flush monitoring program was set at $7,000/year when the MRSWMP was drafted. Now that several years of experience in recruitment have been gained, it does not appear that expending this level of funds is cost-effective. A smaller amount spent on radio advertising could free up funds to be used for a more useful purpose related to the First Flush, such as taking receiving water samples for comparison with end-of-pipe samples which are currently the only samples that a taken.

Another of the Measurable Goals under BMP 2-2.d requires that a minimum of 25% of all outfalls within the MRSWMP area be monitored four times a year, and that representative samples be collected to account for seasonal variation. With the advent of dry weather diversion systems in Pacific Grove, with others being contemplated in other cities, taking samples at many of these outfalls during the dry weather period not longer appears to be of much benefit. As reported in Appendix P, many of these outfalls have no dry weather flows that can be monitored. It would be desirable to reduce the effort put into monitoring these non-existent flows and put that effort into getting receiving water data adjacent to flowing outfalls during the First Flush part of the Expanded Monitoring Program. Also, the data from the First Flush monitoring tends to be repetitive year-after-year and is not really providing much in the way of new data that is useful to the permittees. It would be desirable to consider reducing this portion of the Expanded Monitoring Program, so that the funds could be used for more upstream source tracking to try to locate the source(s) of pollutants that are routinely found during the First Flush portion of the Expanded Monitoring Program.

There was not sufficient time to fully consider revisions to these Measurable Goals before the Annual Report had to be submitted. However, it is likely that there will be revisions made to these Measurable Goals during Year 3 for this purpose. Those will be reported to the RWQCB when they have been properly developed.

b. Presentation of the results of information collected and analyzed, if any, during the reporting period, including any monitoring data used to assess the success of the program at reducing the discharge of pollutants to the MEP.

Outfall source tracking was performed under BMP 2-2.d. The results obtained from this pollutant tracking project showed that there were two sites that were directly affecting the water quality in the storm drain system. The pollutants being released did not appear to have a major impact on the water tested down stream of these sites, but rather caused an immediate acute spike

in readings. The following three possible contributors to these constituents were identified through the source tracking, as follows:

(1) Casa De Amigos Animal Hotel and (2) the adjacent Monterey Animal Hospital both located on Foam Ave near the corner of Prescott Ave. Outdoor pet washing and disinfecting of the animal husbandry area at these facilities appears to be impacting the storm drain system by runoff from these processes being allowed to flow into the curb gutter where it flows down slope and forms a standing pool. It eventually makes its way into a curbside grate and flows down slope to the final discharge pipe on the beach near the Steinbeck Plaza. The City of Monterey has knowledge of these businesses from previous spot checks that they conducted of the area.

(3) Willy's Smokehouse Restaurant located on the corner of Wave Street and Prescott Ave. Washing of the dumpster areas and tallow storage area was witnessed while sampling in this area and the flow was seen flowing off of the property and into the curb side drain. The staff member from Willy's that was conducting this washing was spoken to on site and seemed to acknowledge that what he was doing was a problem, but that he had to do what the facility manager had ordered him to do. He suggested that the manager be made aware of any concerns or requirements.

A complete description of the source tracking work and the analytical results from that work is reported in Appendix N.

Efforts to determine whether or not these were the actual sources of these pollutants are still in progress. The investigative work conducted to date indicates that neither the Monterey Animal Hospital nor the Case de Amigos Animal Hotel are the sources of these pollutants. Initial investigative findings also indicate that Willy's Smokehouse is unlikely to be a source of these pollutants, although that investigation is still in progress. However, other sources are now being investigated as a result of having conducted this source tracking. The results of this ongoing investigation will be reported on in the Year 3 Annual Report. When sources of these pollutants have been verified, the City of Monterey will work with the involved business owners to keep these pollutants out of their discharges to the storm drainage system.

In preparing this section of the Annual Report the following questions pertinent to this Minimum Control Measure were considered, and the responses to each of them are presented .

Question: Is the public participating in your storm water program? Are the meeting times or locations hindering participation?
Response: There are periodically one or more members of the public, as well as representatives from other organizations interested and/or active in storm water pollution prevention issues, at the regularly monthly meetings of the MRSWMP Management Committee. A listserve of interested parties has been developed, and the meeting notices, agendas, and meeting minutes are emailed to anyone wishing to be on that listserve. The meeting times and locations do not appear to be hindering participation. Often the members of the public or the business community who attend these meetings voice their compliments to the members of the Management Committee for the work they are doing and for the activities being carried out under the MRSWMP.

Question: How many people or community groups have gotten involved in your storm water program? Is there any correlation with your storm water education campaigns?
Response: Organizations including The Otter Project and the Monterey Bay Aquarium have gotten involved in our program through participation in the Management Committee's monthly meetings, and/or by providing review comments on draft documents prepared for the MRSWMP. Representatives of the Monterey Bay National Marine Sanctuary are regularly in attendance at these meetings. Some members of the business community, notably the vehicle service facilities, have periodically attended meetings to offer comments and suggestions.

Some of these individuals reported that they became aware of the MRSWMP through the Public Education and Public Outreach and/or the Public Participation and Public Involvement programs conducted by the Permittees.

Question: How does involvement in the storm water program compare to involvement in other similar programs in the community?
Response: This is difficult to gauge, but there has been significant interest in volunteering to participate in the Urban Watch, First Flush, Coastal Cleanup Day, and other public events that pertain to storm water pollution prevent. This is evidenced by the numbers of volunteers that turn out for these programs and events.

Question: If you have a storm water hotline, has the number of calls increased or decreased?
Response: The hotline the Permittees use, the nationwide 1-800-CLEANUP hotline, is advertised in many ways by the sponsors of that hotline, and it is listed on educational brochures prepared and distributed by the MRSWMP Group under the MCM No.1 activities. In spite of this, it appears that there have to date been only a few calls received through this hotline pertaining to storm water pollution prevention issues. However, it is generally not possible to determine whether the caller called the appropriate public works department to report a incident because they were referred to that number via the hotline, or whether they simply phoned the public works department directly on their own initiative.

In any event the intent is to continue trying to increase public awareness of the hotline through the Public Education and Public Outreach program during each Permit year. One comment that is frequently received regarding the hotline is that its menu of options is very extensive and time-consuming to follow, leading to frustration and perhaps to some callers simply hanging up. There does not appear to be anything the MRSWMP Group can do to rectify this, as Earth 911 (the 1-800-CLEANUP national hotline organization) controls the content and operability of the hotline, and in spite of this issue being raised to them, they have maintained their telephone menu formatting.

A participant in this nationwide hotline, such as the MRSWMP Group, is asked to provide specific information that Earth 911 uses to set up the voice prompts that fit into the 1-800-CLEANUP protocols for its call-in system. This includes zip code and telephone number information that directs the caller to the appropriate local entity phone number to which an incident should be reported.

The Group does not have the ability to modify Earth 911's protocols or call-in system, since a

standardized set of protocols are used for all participating entities across the nation.

As suggested in the August 4, 2008 RWQCB letter, the Group will add to its website a listing of zip codes, city names, and the appropriate telephone number in each jurisdiction to which incidents should be reported.

It is not practical for the MRSWMP Group to set up its own local hotline, due to the labor and costs associated with taking on such a responsibility. However, we are looking into revising the language on our Public Education and Public Outreach program materials to indicate that in lieu of calling the hotline, individuals can call their local public works departments directly, if they know which jurisdiction to call, to report storm water pollution incidents.

c. Brief summary of the storm water activities planned to be undertaken during the next reporting cycle, along with an implementation schedule, and justification for any proposed activities that differ from those originally proposed in the approved MRSWMP.

The activities under this MCM that will be carried out during Year 2 are summarized in the following table. Some of these are described in more detail in Appendix B.

BMP Description	BMP No.	Implementation Plan	Proposed Measurable Goal	Modified?		Schedule	
				YES	NO	Complete this year	Ongoing Implementation
Encourage general public and stakeholder involvement in identifying and solving storm water management problems, and gather public input on development and implementation of the MRSWMP, by holding two publicly advertised "Public Involvement Workshops" per a year. Public advertisement will be via local newspapers, city websites, community calendars, and/or MRSWMP email list serve. (See pages E-23 through E-29 of Appendix E of the MRSWMP for the Public Participation and Involvement Program)	2-1.a	Draft annual report will be posted on the SEA website and a public notice of its posting will be displayed in city offices for review by public one month prior to Annual Workshop No. 2.	All written public comments submitted and notes taken at workshop will be considered for inclusion in the annual report and kept on file.	X*			X

BMP Description	BMP No.	Implementation Plan	Proposed Measurable Goal	Modified?		Schedule	
				YES	NO	Complete this year	Ongoing Implementation
Encourage general public and stakeholder involvement in identifying and solving storm water management problems, and gather public input on development and implementation of the MRSWMP, by holding two publicly advertised "Public Involvement Workshops" per a year. Public advertisement will be via local newspapers, city websites, community calendars, and/or MRSWMP email list serve. (See pages E-23 through E-29 of Appendix E of the MRSWMP for the Public Participation and Involvement Program)	2-1.c	Hold Annual Workshop #2 annually in early November prior to Annual Report submission to explain the Phase II Permit objectives and solicit public input on the success of the current BMPs and Measurable Goals.	Workshop advertised in print media and on SEA Website, and pod cast on SEA Website with invitation for non-attending public to submit questions and comments via email.	X			X

BMP Description	BMP No.	Implementation Plan	Proposed Measurable Goal	Modified?		Schedule	
				YES	NO	Complete this year	Ongoing Implementation
Encourage general public and stakeholder involvement in identifying and solving storm water management problems, and gather public input on development and implementation of the MRSWMP, by holding two publicly advertised "Public Involvement Workshops" per a year. Public advertisement will be via local newspapers, city websites, community calendars, and/or MRSWMP email list serve. (See pages E-23 through E-29 of Appendix E of the MRSWMP for the Public Participation and Involvement Program)	2-1.d	Hold Annual Workshop #1 annually in Mar-April: Workshop #1 in Years 2-5 will focus on a specific target audience and associated contaminants of concern. Topic/audience will be chosen each year based on historical contaminants of concern for industries common to permit jurisdiction area, volunteer monitoring network data, and topic/audience not chosen the prior year. Priority will be given to the Inventory of Businesses to be Inspected contained on pages E-37 through E-65 of Appendix E of the MRSWMP.	Workshop advertised in print media and on SEA Website.	X			X

BMP Description	BMP No.	Implementation Plan	Proposed Measurable Goal	Modified?		Schedule	
				YES	NO	Complete this year	Ongoing Implementation
Encourage general public participation in programs and activities designed to promote understanding and awareness of storm water pollution, such as cleanup events and restoration activities. (See pages E-23 through E-29 of Appendix E of the MRSWMP for the Public Participation and Involvement Program)	2-2.a	Provide financial sponsorship support for Annual Coastal Cleanup Day in Monterey County or other local beach clean up efforts.	Annual financial sponsorship of up to $500 to cover expenses not covered by sponsors.		X		X
			Provide staffing that amounts to 40 hours for coordinating this event.		X		X

BMP Description	BMP No.	Implementation Plan	Proposed Measurable Goal	Modified?		Schedule	
				YES	NO	Complete this year	Ongoing Implementation
Encourage general public participation in programs and activities designed to promote understanding and awareness of storm water pollution, such as cleanup events and restoration activities. (See pages E-23 through E-29 of Appendix E of the MRSWMP for the Public Participation and Involvement Program)	2-2.b	Recruit volunteers through municipal employee base and through advertising for Annual Coastal Clean Up Day or other local clean up efforts.	Each permit holder to recruit volunteers through two separate agency channels; e.g. email, paycheck stuffers, internal newsletters, etc. Include in the Annual Report a tabulation of the total number of participants in the event and the total amount of waste collected.	X			X
			Air radio advertising before the event to encourage public participation		X		X

BMP Description	BMP No.	Implementation Plan	Proposed Measurable Goal	Modified?		Schedule	
				YES	NO	Complete this year	Ongoing Implementation
Encourage general public participation in programs and activities designed to promote understanding and awareness of storm water pollution, such as cleanup events and restoration activities. (See pages E-23 through E-29 of Appendix E of the MRSWMP for the Public Participation and Involvement Program)	2-2.c	Provide support for, or assistance with, storm drain stenciling through providing supplies, volunteer recruitment, and staff labor.	Explore additional partnerships and encourage civic organizations to adopt storm drains to maintain.		X		X
			Provide stenciling equipment, supplies, and maps of inlets to be stenciled, and complete a minimum of 300 drains and tabulate areas stenciled. Percent of all entities completed per year will be approximately 5-10%.		X		X

BMP Description	BMP No.	Implementation Plan	Proposed Measurable Goal	Modified?		Schedule	
				YES	NO	Complete this year	Ongoing Implementation
Encourage general public participation in programs and activities designed to promote understanding and awareness of storm water pollution, such as cleanup events and restoration activities. (See pages E-23 through E-29 of Appendix E of the MRSWMP for the Public Participation and Involvement Program)	2-2.d	Provide financial support for, or assistance with, volunteer monitoring programs and public participation events such as: Urban Watch, First Flush, Snapshot Day, and Walk N' Talk Days	Provide $13,000 annual contribution for Urban Watch for professional staffing, equipment, lab analysis, and report writing.		X		X

BMP Description	BMP No.	Implementation Plan	Proposed Measurable Goal	Modified?		Schedule	
				YES	NO	Complete this year	Ongoing Implementation
Encourage general public participation in programs and activities designed to promote understanding and awareness of storm water pollution, such as cleanup events and restoration activities. (See pages E-23 through E-29 of Appendix E of the MRSWMP for the Public Participation and Involvement Program)	2-2.d (cont'd)	Provide financial support for, or assistance with, volunteer monitoring programs and public participation events such as: Urban Watch, First Flush, Snapshot Day, and Walk N' Talk Days	Provide $1,500 annually for Urban Watch for print ads to recruit volunteers.		X		X
			Provide $3,000 annual contribution for First Flush for professional staffing, equipment, lab analysis, and report writing.		X		X
			Purchase $7,000 annually for radio ads to promote participation in First Flush (Proposed modification to be developed and submitted to the RWQCB during Year 3)	X			X
			Provide $1,500 annually for First Flush for print ads to recruit volunteers.		X		X
			Provide $1,000 annual contribution for Snapshot Day for professional staffing, equipment, lab analysis, and report writing.		X		X
			Provide $500 annually for Snap Shot Day for print ads to recruit volunteers.		X		X
			Provide $300 to $500 annually for Walk N' Talk to garner public participation and a co-host representative for each event.		X		X

BMP Description	BMP No.	Implementation Plan	Proposed Measurable Goal	Modified?		Schedule	
				YES	NO	Complete this year	Ongoing Implementation
Encourage general public participation in programs and activities designed to promote understanding and awareness of storm water pollution, such as cleanup events and restoration activities. (See pages E-23 through E-29 of Appendix E of the MRSWMP for the Public Participation and Involvement Program)	2-2.d (cont'd)	Prioritize Pollutants of Concern (see subheading titled "Conclusions" on page 4-13) from Urban Watch and First Flush data; conduct source tracking using upstream monitoring for highest priority pollutants and use this to identify probable sources; inspect these sources under Minimum Control Measure No. 3 and take appropriate corrective actions in accordance with BMPs 3-3.d and 3-4.a	In each of the indicated years perform source tracking on the two highest priority pollutants of concern on a minimum of one outfall, and report on findings and actions taken in the Annual Reports for each of the indicated years.		X		X

BMP Description	BMP No.	Implementation Plan	Proposed Measurable Goal	Modified?		Schedule	
				YES	NO	Complete this year	Ongoing Implementation
Encourage general public participation in programs and activities designed to promote understanding and awareness of storm water pollution, such as cleanup events and restoration activities. (See pages E-23 through E-29 of Appendix E of the MRSWMP for the Public Participation and Involvement Program)	2-2.d (cont'd)	Within the MRSWMP area the First Flush and Urban Watch monitoring programs will be expanded to include the following: Outfalls which receive drainage from commercial, industrial, or residential areas which meet the following criteria: (1) Are over 18" in diameter, and (2) Are safe for volunteers/staff to access, including those that discharge to a 303(d) listed water body. Conduct monitoring on these additional outfalls for a similar set of constituents as are monitored under the Urban Watch and First Flush Programs. Monterey County will focus on 303(d) listed water bodies in Year 2, and will expand into the other water bodies over the remaining permit term.	A minimum of 25% of all outfalls within the MRSWMP area will be monitored four times a year in each of the indicated years. Representative samples will be collected to account for seasonal variation. The results will be included in the Annual Reports for those years. (Proposed modification to be developed and submitted to the RWQCB during Year 3)	X			X

BMP Description	BMP No.	Implementation Plan	Proposed Measurable Goal	Modified?		Schedule	
				YES	NO	Complete this year	Ongoing Implementation
Become an active participant in the Citizen Water Quality Monitoring Network (See pages E-23 through E-29 of Appendix E of the MRSWMP for the Public Participation and Involvement Program)	2-3.a	A representative from the MRSWMP group will become an active participant in the Citizen Water Quality Monitoring Network.	100% of monitoring network meetings to be attended annually by member of MRSWMP group.		X		X

* The Measurable Goal was not changed, but the means of disseminating the Draft Annual Report to the public, as described in the "Implementation Plan" was modified as described in paragraph v. of this Section.

3. ILLICIT DISCHARGE DETECTION AND ELIMINATION

Status of BMPs and Implementation Plans

BMP Description	*BMP No.*	*Implementation Plan*	*Status*					
			Implemented	Not Applicable	Modified	Effective	Unknown	Not Effective
Create a unified place for public to call in potential illicit discharges	3-1.b	Advertise 1-800-CLEANUP call-in number on MRSWMP generated-media and educational materials	X			X		
	3-1.c	Using the protocol contained on pages E-30 through E-33 of Appendix E of the MRSWMP, investigate and take appropriate action on each report of illicit discharge that is received.	X			X		
Storm water system mapping	3-2.a	Complete preparation of the storm drain system map contained on pages E-34 through E-36 of Appendix E of the MRSWMP, showing the location of all outfalls discharging to waters of the state and other MS4s that receive discharges from those outfalls	X			X		
	3-2.b	Update the outfall map annually to include new facilities as appropriate	X			X		
Implement and maintain a program to detect and eliminate illicit connections and/or discharges; i.e., sewer overflows, fluid dumping in catch basins etc.	3-3.b	Using the inventory of businesses to be inspected and the inspection checklists contained on pages E-37 through E-77 of Appendix E of the MRSWMP, prioritize the businesses to be inspected, and perform compliance inspections on these businesses to identify illicit connections and illegal discharges. Discharges to Environmentally Sensitive Areas, discharges to Areas of Special Biological Significance, restaurants/fast food chains, auto repair shops, and gas stations will receive top prioritization in scheduling these inspections.	X			X		

BMP Description	*BMP No.*	*Implementation Plan*	*Status*					
			Implemented	Not Applicable	Modified	Effective	Unknown	Not Effective
Implement and maintain a program to detect and eliminate illicit connections and/or discharges; i.e., sewer overflows, fluid dumping in catch basins etc.	3-3.d	Using the protocol contained on pages E-78 through E-79 and E-95 through E-98 of in Appendix E of the MRSWMP, take action as necessary to eliminate 100% of the illicit connections and illegal discharges that are identified in this year	X			X		
	3-3.e	Perform source tracking of manholes in the Hot Spot areas listed on page E-199 of Appendix E to determine source of pollutants	X			X		
Adopt an ordinance with standards for storm water pollution prevention. Ordinance to include definitions of illegal disposal activities, including requirements pertaining to mat wash downs, hood cleaning, etc., and requiring firms to notify Public Works of all such cleaning activities, with penalties for violations. Ordinance will also outline responsibility for any clean up determined necessary.	3-4.a	**[<u>Note</u>: This is not a BMP for Year 2, but some entities had not completed implementing their ordinances in Year 1, so this BMP is again being reported on in Year 2]** Using the guidance document and model ordinance contained on pages E-80 through E-98 of Appendix E of the MRSWMP, each Participating Entity will adopt a storm water ordinance revised to be specific to each entity's needs through appropriate governing body procedures.	X			X		
	3-4.b	Train appropriate staff on the adopted ordinance	X			X		
	3-4.c	Implement ordinance	X			X		

BMP Description	*BMP No.*	*Implementation Plan*	*Status*					
			Implemented	Not Applicable	Modified	Effective	Unknown	Not Effective
Inspection program to ensure compliance from RVs & boats	3-5.a	Using the inventory of RV parks and boat marinas and the inspection lists contained on pages E-119 through E-124 of Appendix E, inspect each RV park and boat marina annually, and take action to correct any observed violations of the discharge ordinance	X			X		
Implement a permit boundary-wide education program addressing the negative effects on water quality through illegal discharges, improper waste disposal and other non-storm water discharges.	3-6.a	This is included in the Public Education and Outreach Program contained on pages E-1 through E-23 of Appendix E of the MRSWMP.	X			X		

a. BMPs

i. General Summary

The most successful BMPs under this MCM during Year 2 were the business inspections that were conducted under BMP 3-3.b, the boating marina/RV park inspections that were conducted under BMP 3-5.a, and the source tracking inspections performed under BMP 3-3.e. The inspections found that most locations were operating in compliance with the storm water pollution prevention requirements, but did identify a number of things to be corrected. Those corrections will reduce the discharge of pollutants to the storm drainage system.

The source tracking inspections were useful in that none of the inspections in any of the entities revealed evidence of illegal discharges or illicit connections.

For all of the permittees, including those entities that were still in the process of adopting their ordinances during the current reporting period, there were procedures in place for responding to illegal discharges to the storm drain system. Spills and discharges were cleaned up and responsible parties were identified. Appropriate enforcement action was taken.

As the ordinances complete being implemented in all eight of the co-permittee jurisdictions

during Year 3, it is anticipated that a greater number of illicit connections/discharges will be eliminated.

ii. Status of Measurable Goals

BMP No.	*Measurable Goal*	*Measurable Goal Met by all Permittees, unless otherwise noted in the "Comments" column*	*Measurable Goal Not Met*	*Comments*
3-1.b	Advertised on a minimum of 8 different media pieces: 4 in English, 4 in Spanish	X		See Program Activity/Target No. 12 in Appendix A for information regarding this BMP, which was performed by the eight co-permittees as a group activity.
3-1.c	100% of all reports of illicit discharge investigated and report on outcome of each case in the form of "closed", "ongoing enforcement", or "still investigating source".	X		Information on each individual co-permittee regarding this Measurable Goal is included in the Appendices.
3-2.a	Each Participating Entity to complete its mapping by end of Year 1, except Monterey County which will complete its mapping by end of Year 3	X		The updated storm water maps prepared by the County during Year 2 are contained in Appendix K. The County was the only entity that did not complete its mapping work in Year 1.
3-2.b	Include updated map in the Annual Reports	X		None of the entities that had completed mapping in Year 1 under BMP 3-2.a had made any changes to their outfall systems, as reported in the Appendices for each entity. The maps contained in Appendix K for those entities are up-to-date.

BMP No.	*Measurable Goal*	*Measurable Goal Met by all Permittees, unless otherwise noted in the "Comments" column*	*Measurable Goal Not Met*	*Comments*
3-3.b	Minimum of 100% of inventoried businesses inspected by the end of the permit term.	X		All permittees except Marina completed this Measurable Goal. Marina had not adopted its Storm Water Ordinance, but intends to do so during Year 3, and plans to perform business inspections thereafter. Marina does not anticipate having any problem completing 100% of its business inspections by the end of the permit term. Information on each individual co-permittee regarding this Measurable Goal is included in the Appendices.
3-3.d	100% of all reports of illicit connections and illegal discharges investigated and report on outcome of each case in the form of "closed", "ongoing enforcement", or "still investigating source".	X		Information on each individual co-permittee regarding this Measurable Goal is included in the Appendices.
3-3.e	Inspect 100% of confluent manholes in Hot Spot areas listed on page E-199 of Appendix E annually, and carry out source tracking procedures described on page E-82 as appropriate.	X		Information on each individual co-permittee regarding this Measurable Goal is included in the Appendices.
3-4.a	Date ordinance implemented (implemented within 3 months of permit coverage for all entities except Monterey County, which will implement within 6 months of permit coverage)	X		All co-permittees except the City of Marina and the County of Monterey had completed adopting their ordinances by the end of the current reporting period. The status of adoption of ordinance for these two co-permittees is discussed in their respective Appendices.
3-4.b	100 % of existing appropriate staff trained by Year 2, then all appropriate new employees every year after that	X		See comments on BMP 3-4.a. Information on each individual co-permittee regarding this Measurable Goal is included in the Appendices.

BMP No.	*Measurable Goal*	*Measurable Goal Met by all Permittees, unless otherwise noted in the "Comments" column*	*Measurable Goal Not Met*	*Comments*
3-4.c	Implement ordinance	X		See comments on BMP 3-4.a. Information on each individual co-permittee regarding this Measurable Goal is included in the Appendices.
3-5.a	100% of RV parks & boat marinas inspected annually	X		Only two co-permittees, the Cities of Monterey and Marina, have either of these types of facilities. Monterey inspected its facilities during Year 2 as reported in Appendix F, but Marina did not, since it had not adopted its Storm Water Ordinance, as reported in Appendix E.
3-6.a	Summary of methods used to educate the public about the impacts of illegal discharges and improper waste disposal to be included in the Annual Reports.	X		See Appendix A for information regarding this BMP, which was performed by the eight co-permittees as a group activity.

iii. Appropriateness

With the possible exception of the BMPs pertaining to the creation of a hotline for the public to use in reporting illegal discharges, all of the BMPs under this MCM appear to be appropriate. The hot line was activated and publicized as the permittees committed to do in Year 1. Because the hot line directs the caller by providing them with zip code-specific information about what public works phone number should be called to report the incident, it is not known how many reports were received by the permittees as a direct result of having the hotline. The permittees have received some of these types of telephone reports, but they were also receiving similar reports before the hotline was created. Therefore, it is difficult to determine whether or not the hotline is a useful tool for this MCM.

During Year 2 the hot line remained fully active, and the permittees (as a Group under MCM No. 1) continued to inform the public of the availability of the hotline in a continuing effort to make it as effective as possible.

As discussed on pages 4-13 and 4-14 of the MRSWMP, bacteria, metals, and orthophosphates are the *"Pollutants of Concern"* toward which certain BMPs are targeted. Under MCM No. 3, all of the BMPs are intended to reduce the discharge of these pollutants of concern. The Table below describes how each of these BMPs will help to control and

reduce the discharge of these pollutants.

BMP No.	Targeted Pollutant(s) of Concern	How this BMP Will Help to Control and Reduce Discharge of These Pollutants
3-1.a, 3-1.b, 3-1.c, 3-3.c, and 3-3.d	Bacteria, metals, and orthophosphates	Providing an easy means for members of the public to report illegal discharges and illicit connections will reduce such discharges by enabling storm water program personnel on the staffs of each of the permittees to respond to, correct, cleanup, and/or take enforcement actions regarding such discharges.
3-2.a and 3-2.b	Bacteria, metals, and orthophosphates	Having up-to-date storm water outfall maps will enable the storm water program personnel on the staffs of each of the permittees to determine whether any near-shore or off-shore monitoring that shows elevated levels of these constituents might be associated with discharges from these outfalls. If such an association is determined to exist, the affected permittee(s) will then perform upstream source tracking under BMP 2-2.d to determine the source of such discharges, and to eliminate them.

BMP No.	Targeted Pollutant(s) of Concern	How this BMP Will Help to Control and Reduce Discharge of These Pollutants
3-3.a and 3-3.b	Bacteria, metals, and orthophosphates	Training personnel to inspect businesses, and then conducting these inspections, will help to eliminate illicit connections and illegal discharges of these constituents, particularly those that contain metals which may be found at vehicle service facilities and gas stations, and orthophosphates which often come from food service facilities.
3-3.e	Bacteria, metals, and orthophosphates	Annual inspections of the confluent manholes in the Hot Spot areas to determine (visually) whether illegal discharges are occurring will reduce such discharges by enabling storm water program personnel on the staffs of each of the permittees to locate the sources of such discharges and to then eliminate such discharges.
3-4.a, 3-4.b, and 3-4.c	Bacteria, metals, and orthophosphates	Enacting a storm water pollution prevention Ordinance provides the permittees with the legal authority to take enforce actions to eliminate the illegal discharge of these pollutants.

BMP No.	Targeted Pollutant(s) of Concern	How this BMP Will Help to Control and Reduce Discharge of These Pollutants
3-5.a	Bacteria and orthophosphates	Bacteria and orthophosphates may typically be found in discharges from RV parks, where wastewater holding tanks may be improperly discharged to the storm sewer rather than to the sanitary sewer. These same constituents may also typically be found in discharges from wastewater holding tanks and bilges on marine vessels. Inspecting these types of facilities on an annual basis will help to identify and eliminate the discharge of these constituents.
3-6.a	Bacteria, metals, and orthophosphates	Educating the public on the adverse impacts of the discharge of these constituents, through the Public Education and Public Outreach Program under MCM No. 1, will help to reduce such discharges by encouraging the public to change their behavior and practices with regard to how they handle and discharge these types of materials.

iv. Effectiveness

With the possible exception of the BMPs pertaining to the creation of a hotline for the public to use in reporting illegal discharges, all of the BMPs under this MCM appeared to be effective. Some of these BMPs were not implemented until near the end of the current reporting period, and therefore their effectiveness cannot be accurately ascertained.

The effectiveness of the BMPs under this MCM is described in the Section titled "Effectiveness Assessment."

v. Proposed Modifications

BMPs 3-1.c and 3-3.d: These two BMPs have been the source of confusion and consternation among the co-permittees, because the language contained in them is very similar and overlapping. The Measurable Goal for BMP 3-1.c reads:

"100% of all reports of illicit discharge investigated and report on outcome of each case in the form of "closed", "ongoing enforcement", or "still investigating source",

while the Measurable Goal for BMP 3-3.d reads:

"Using the protocol contained on pages E-78 through E-79 and E-95 through E-98 of in Appendix E of the MRSWMP, take action as necessary to eliminate 100% of the illicit connections and illegal discharges that are identified in this year"

The intent of BMP 3-1.c was to investigate and take corrective action on reported incidents, and the intent of BMP 3-3.d was to take appropriate enforcement action pertaining to these incidents. Most of the co-permittees track their actions together, rather than separately, so it is proposed to consolidate these two BMPs into a single BMP (3-1.c) which would read:

New BMP 3-1.c: Using the protocol contained on pages E-30 through E-33 of Appendix E of the MRSWMP, investigate and take appropriate action on each report of illicit discharge that is received. Using the protocol contained on pages E-78 through E-79 and E-95 through E-98 of in Appendix E of the MRSWMP, take appropriate enforcement action regarding these incidents.

b. Presentation of the results of information collected and analyzed, if any, during the reporting period, including any monitoring data used to assess the success of the program at reducing the discharge of pollutants to the MEP.

Under BMP 3-3.e Hot Spot source tracking inspections were performed under this MCM, as reported in the Appendices. However, none of the inspections revealed evidence of any illegal discharges, so no upstream source tracking needed to be performed. The Appendices contain information from each of the co-permittees pertaining to this MCM. The Appendices also contain information on business inspections performed under this MCM. Some of the permittees performed large numbers of business inspections, while others were just getting started.

In preparing this section of the Annual Report the following questions pertinent to this Minimum Control Measure were considered, and the responses to each of them are presented.

Question: Assuming the Group establishes a storm water hotline (1-800-CLEANUP or other), how many calls did the entity receive as a result of the hotline?
Response: Because of the way 1-800-CLEANUP operates and is configured, callers are directed to phone the appropriate telephone number within each jurisdiction to make reports. Hence, when a call is received by the jurisdiction, they do not know whether the call came as a result of the caller first phoning 1-800-CLEANUP, or whether the caller called the jurisdiction directly without having called 1-800-CLEANUP. Thus, it is not possible to determine how many calls were received as a result of the hotline. This is why a rating of "Unknown" was given for the BMPs under this MCM that pertain to the hotline.

Question: Are legitimate storm water issues reported?
Response: Yes. Virtually all calls that were received pertained to legitimate storm water issues.

Question: Is the hotline being abused (i.e. used as a weapon between quarreling neighbors)?
Response: No evidence of this was observed in the calls that were received by the co-permittees.

Question: Are there any trends in the calls (e.g. recurring neighborhoods, same types of discharges)?
Response: No. The calls reported unrelated incidents in a variety of locations and jurisdictions.

Question: Do you know how people learned about the hotline?
Response: No. As explained above, the co-permittees do not know if the caller called as a result of the hotline, or called the co-permittees directly.

Question: Do you track the reports that are received from the hotline, as well as from any other sources?
Response: Yes. This is reported on in the individual co-permittee Appendices.

Question: Do you receive public complaints directly from the internet?
Response: No complaints were received through the Group's website. Individual co-permittee websites, however, may have received complaints, but they are not tracked in a manner that would reveal this information.

Question: How much time is spent detecting illicit discharges?
Response: During the current reporting period efforts were directed at responding to reports from citizens and co-permittee staff members, and also in seeking to detect illegal discharges and illicit connections by conducting business inspections. The following are estimates by some of the permittees on the time they spent on this work:

- The City of Monterey estimated that it spent 50 hours of city staff time, and 458 hours of MRWPCA staff time performing this work during the current reporting period.
- The City of Seaside estimated that it spent 120 hours of city staff time, and 232 hours of MRWPCA staff time performing this work during the current reporting period.
- The County of Monterey estimated that it spent 100 hours of staff time detecting illegal discharges and illicit connections within its urbanized areas during the current reporting period.

Question: Are you able to effectively trace the illicit discharge back to its source? How much time is spent doing this?
Response: Within the context of the ordinances adopted by the co-permittees "illegal discharges" are all non-stormwater discharges to the storm drainage system, except certain exempted discharges as described in the ordinance. Within the context of these ordinances, "illicit connections" refers to drains and conveyances that allow illegal discharges to enter the storm drainage system. The business inspections conducted to date have identified very few illicit connections, but did detect some sources of illegal discharges. Most of the investigations of illegal discharges reported during the current reporting period were successful in identifying

the source of the discharge. Records are not kept of the amounts of time spent on this work, as it is just carried out as part of routine staff duties.

Question: What is the process for taking enforcement actions for illicit discharges, including the types of actions that were taken and the procedures for resolving them.
Response: The processes are described under Division V "Enforcement" of the ordinances adopted by the co-permittees, as described on pages E-95 through E-98 of Appendix E to the MRSWMP. The protocol for enforcement is described on pages E-78 through E-84 of Appendix E to the MRSWMP. The enforcement actions taken by each co-permittee are described in their respective Appendices. To date in nearly all cases, only a warning needed to be given to halt the illegal discharge.

Question: Were the enforcement actions appropriate for the violations?
Response: Yes. In most instances the violator was cooperative and willing to take the necessary corrective action upon receiving a warning notice from the jurisdiction. However, recurring violations will lead to more severe enforcement action, as described under the response to the question above.

Question: Were they too harsh to typically be invoked or too lenient to provide deterrence?
Response: No, as noted above to date the vast majority of violators have been cooperative.

Question: How does the amount of resources spent on education compare to the amount spent on enforcement?
Response: To date more money is being spent on public education through the work conducted under MCMs No. 1 and 2. As noted in the Year 1 Annual Report, it was anticipated that as the business inspection work progressed, more money would be spent on enforcement actions, assuming that violations were detected through the inspection process. However, as noted above, thus far very few violations have been found during these inspections, and rarely, if ever, has this lead to the need to take extensive enforcement action.

Question: Did you prioritize certain areas of the community (e.g. geographic, types of businesses, types or land use, etc.) for illicit discharge detection activities?
Response: Yes. The jurisdictions each prioritized the business types to inspect. In some cases that prioritization process took into account geographic locations where higher levels of storm water pollution from businesses were believed to be occurring. All of the entities agreed that the initial business inspections would cover the restaurant, gas station, and vehicle maintenance facility business categories, since these were considered by EPA to be the types of businesses most likely to be the source of storm water pollutants.

Question: Has this prioritization enabled you to leverage and stretch your resources to reduce more storm water pollution at a lesser cost?
Response: This is not known with certainty, but as the business inspections proceed it should become apparent whether or not the targeted businesses are contributing significantly to storm water pollution. The results of the initial business inspections to date have not shown these businesses to be significant sources of pollution.

c. <u>Brief summary of the storm water activities planned to be undertaken during the next reporting cycle, along with an implementation schedule, and justification for any proposed activities that differ from those originally proposed in the approved MRSWMP.</u>

The activities under this MCM that will be carried out during Year 3 are summarized in the following table.

BMP Description	BMP No.	Implementation Plan	Proposed Measurable Goal	Modified?		Schedule	
				YES	NO	Complete this year	Ongoing Implementation
Create a unified place for public to call in potential illicit discharges	3-1.b	Advertise 1-800-CLEANUP call-in number on MRSWMP generated-media and educational materials	Advertised on a minimum of 8 different media pieces: 4 in English, 4 in Spanish		X		X
Create a unified place for the public to call in potential illicit discharges	3-1.c	Using the protocol contained on pages E-30 through E-33 of Appendix E of the MRSWMP, investigate and take appropriate action on each report of illicit discharge that is received. Using the protocol contained on pages E-78 through E-79 and E-95 through E-98 of in Appendix E of the MRSWMP, take appropriate enforcement action regarding these incidents.	100% of all reports of illicit discharge investigated and report on outcome of each case in the form of "closed", "ongoing enforcement", or "still investigating source". Appropriate enforcement action taken regarding each incident.	X			X
Storm water system mapping	3-2.a	Complete preparation of the storm drain system map contained on pages E-34 through E-36 of Appendix E of the MRSWMP, showing the location of all outfalls discharging to waters of the state and other MS4s that receive discharges from those outfalls	Each Participating Entity to complete its mapping by end of Year 1, except Monterey County which will complete its mapping by end of Year 3		X		X

BMP Description	BMP No.	Implementation Plan	Proposed Measurable Goal	Modified?		Schedule	
				YES	NO	Complete this year	Ongoing Implementation
	3-2.b	Update the outfall map annually to include new facilities as appropriate.	Update the outfall map annually to include new facilities as appropriate.		X		X
Implement and maintain a program to detect and eliminate illicit connections and/or discharges; i.e., sewer overflows, fluid dumping in catch basins etc.	3-3.b	Using the inventory of businesses to be inspected and the inspection checklists contained on pages E-37 through E-77 of Appendix E of the MRSWMP, prioritize the businesses to be inspected, and perform compliance inspections on these businesses to identify illicit connections and illegal discharges. Discharges to Environmentally Sensitive Areas, discharges to Areas of Special Biological Significance, restaurants/fast food chains, auto repair shops, and gas stations will receive top prioritization in scheduling these inspections.	Minimum of 100% of inventoried businesses inspected by the end of the permit term.		X		X
	3-3.d	BMP 3-3.d eliminated through consolidation into Modified BMP 3-1.c	Measurable Goal eliminated through consolidation into the Measurable Goal for Modified BMP 3-1.c	X			X
	3-3.e	Perform source tracking of manholes in the Hot Spot areas listed on page E-199 of Appendix E to determine source of pollutants	Inspect 100% of confluent manholes in Hot Spot areas listed on page E-199 of Appendix E annually, and carry out source tracking procedures described on page E-82 as appropriate.		X		X

BMP Description	BMP No.	Implementation Plan	Proposed Measurable Goal	Modified?		Schedule	
				YES	NO	Complete this year	Ongoing Implementation
Adopt an ordinance with standards for storm water pollution prevention. Ordinance to include definitions of illegal disposal activities, including requirements pertaining to mat wash downs, hood cleaning, etc., and requiring firms to notify Public Works of all such cleaning activities, with penalties for violations. Ordinance will also outline responsibility for any clean up determined necessary.	3-4.b	Train appropriate staff on the adopted ordinance	100 % of existing appropriate staff trained by Year 2, then all appropriate new employees every year after that	X (See footnote 1)			

BMP Description	BMP No.	Implementation Plan	Proposed Measurable Goal	Modified?		Schedule	
				YES	NO	Complete this year	Ongoing Implementation
Inspection program to ensure compliance from RVs & boats	3-5.a	Using the inventory of RV parks and boat marinas and the inspection lists contained on pages E-119 through E-124 of Appendix E of the MRSWMP, inspect each RV park and boat marina annually, and take action to correct any observed violations of the discharge ordinance	100% of RV parks & boat marinas inspected annually		X (See footnote 2)		X
Implement a permit boundary-wide education program addressing the negative effects on water quality through illegal discharges, improper waste disposal and other non-storm water discharges.	3-6.a	This is included in the Public Education and Outreach Program contained on pages E-1 through E-23 of Appendix E of the MRSWMP.	Summary of methods used to educate the public about the impacts of illegal discharges and improper waste disposal to be included in the Annual Reports.		X		X

Footnotes: (1) Ordinances are scheduled to go before the County Board of Supervisors and Marina's Council for adoption in Permit Year 3.

(2) The Saddle Mountain Recreation Park RV park listed on page E-119 in Appendix E to the MRSWMP is not within the County's urbanized area and should be removed from the list.

4. CONSTRUCTION SITE STORM WATER RUNOFF CONTROL

Status of BMPs and Implementation Plans:

BMP Description	*BMP No.*	*Implementation Plan*	*Status*					
			Implemented	Not Applicable	Modified	Effective	Unknown	Not Effective
Adopt an ordinance with standards for storm water pollution prevention associated with construction activities. Ordinance to include standards for general construction site waste management for construction activities as defined by the General Construction Storm Water Permit	4-1.a	**[<u>Note</u>: This is not a BMP for Year 2, but some entities had not completed implementing their ordinances in Year 1, so this BMP is again being reported on in Year 2]** Using the guidance document and model ordinance contained on pages E-84 through E-98 and E-125 through E-131 of Appendix E of the MRSWMP, each Participating Entity will adopt a storm water ordinance revised to be specific to each entity's needs through appropriate governing body procedures	X			X		
Implement procedures for site plan review, including consideration of potential water quality impacts	4-2.a	Train appropriate staff on the site plan and construction inspection procedures contained on pages E-125 through E-131 of Appendix E procedures	X			X		
	4-2.b	Use the site plan review procedures contained on pages E-100 through E-103 and E-125 through E-131 of Appendix E when reviewing construction projects	X			X		
Implement procedures for site inspection and enforcement of BMP control measures	4-3.a	Train appropriate staff on the construction site inspection procedures. Topics to be covered in this training will be the applicable portions of the materials contained on pages E-125 through E-136 of Appendix E, consisting of: 1. The Guidance Document for Policies and Procedures Pertaining to Construction Sites 2. Construction Site Plan Review and Inspection Procedures 3. Inspection Checklist for Construction Sites	X			X		

BMP Description	*BMP No.*	*Implementation Plan*	*Status*					
			Implemented	Not Applicable	Modified	Effective	Unknown	Not Effective
Implement procedures for site inspection and enforcement of BMP control measures	4-3.b	Using the procedures and checklists contained on pages E-127 through E-136 of Appendix E, inspect the construction sites subject to the storm water ordinance and take appropriate action to have any observed violations corrected			X	X		
Implement procedures for receipt and consideration of information submitted by the public regarding storm water runoff impacts associated with construction projects.	4-4.a	Use the procedures contained on pages E-30 through E-33 of Appendix E of the MRSWMP to facilitate the receipt of, and the response to, reports from the public of storm water pollution from construction sites.	X			X		
Implement a permit boundary-wide education program addressing the negative effects on water quality from improperly managed construction site runoff.	4-4.b	Twice per year at construction contractor professional meetings, present an educational program regarding prevention of storm water pollution from construction sites. The program will cover the four guiding principles for controlling runoff from construction sites, which are included in the BMP Guidance Series: • Construction site planning • Minimization of soil movement • Capturing of Sediment • Good housekeeping practices At these presentations handouts describing construction site permitting procedures and construction site BMPs will also be distributed.	X			X		

a. BMPs

i. General Summary

Each of the BMPs under this MCM were successful in achieving their particular objectives.

For all of the permittees, including those entities that were still in the process of adopting their

ordinances during the current reporting period, there were procedures in place for responding to illegal discharges to the storm drain system. Spills and discharges were cleaned up and responsible parties were identified, and appropriate enforcement action was taken.

The construction site storm water pollution prevention measures required under the ordinances did not become effective until Permit Year 2. In anticipation of this, training was conducted near the end of Year 1 for those co-permittee staff members who would be involved in conducting construction site inspections, so they would be properly prepared to conduct those inspections beginning in Permit Year 2. Refresher training on these topics was provided during Year 2 to increase the knowledge level and awareness of the entity staff members that deal with these issues.

As the measures required by the ordinances are implemented, it is anticipated that there will be a greater reduction in storm water pollution sources emanating from construction sites.

ii. Status of Measurable Goals

BMP No.	***Measurable Goal***	***Measurable Goal Met by all Permittees, unless otherwise noted in the "Comments" column***	***Measurable Goal Not Met***	***Comments***
4-1.a	Date ordinance implemented (implemented within 3 months of permit coverage for all entities except Monterey County, which will implement within 6 months of permit coverage)	X		See comments under the Measurable Goal for BMP 3-4.a.

BMP No.	*Measurable Goal*	*Measurable Goal Met by all Permittees, unless otherwise noted in the "Comments" column*	*Measurable Goal Not Met*	*Comments*
4-2.a	100 % of existing appropriate staff trained by Year 2, then all new appropriate employees every year after that	X		Although providing training associated with BMPs 4-2.a and 4-3.a, which also pertain to construction site storm water pollution prevention, was not scheduled to occur until Year 2 when BMPs 4-2.b and 4-3.b went into effect, the training was performed toward the end of Year 1 in order for staff members to be prepared to carry out BMPs 4-2.b and 4-3.b. Additional refresher training was provided on both of these BMPs on August 14, 2008 during Year 2. A copy of the Powerpoint slides used in the training session associated with both of these BMPs was included in Appendix L of the Year 1 Annual Report. The training in both Years 1 and 2 was combined training for BMPs 4-2.a and 4-3.a. Information on each individual co-permittee regarding participation in The Year 2 training is included in the Appendices for each of the co-permittees in this Year 2 Annual Report. Information on the Year 1 training was included under BMP 4-3.a in the Year 1 Annual Report appendices for each of the co-permittees.

BMP No.	***Measurable Goal***	***Measurable Goal Met by all Permittees, unless otherwise noted in the "Comments" column***	***Measurable Goal Not Met***	***Comments***
4-2.b	100% of construction site plans reviewed for compliance	X		Plans were reviewed for compliance, but not necessarily using the exact procedures described in Appendix E of the MRSWMP, because most of the permittees had different review procedures already in place. Information on each individual co-permittee regarding this Measurable Goal is included in the Appendices.
4-3.a	100 % of existing appropriate staff trained by Year 2, then all new appropriate employees every year after that, with periodic refresher training provided	X		See Comments under the Measurable Goal for BMP 4-2.a.
4-3.b	100% of construction sites subject to the storm water ordinance inspected in accordance with inspection frequencies listed on page E-129 of Appendix E, and violations corrected	X		Sites were inspected for compliance, but not necessarily using the exact procedures described in Appendix E of the MRSWMP, because most of the permittees had different inspection procedures already in place. Information on each individual co-permittee regarding this Measurable Goal is included in the Appendices.
4-4.a	100% of all reports of construction site storm water pollution investigated and report on outcome of each case in the form of "closed", "ongoing enforcement", or "still investigating source".	X		Information on each individual co-permittee regarding this Measurable Goal is included in the Appendices. See also Comments under the Measurable Goal for BMP 4-2.a.

BMP No.	*Measurable Goal*	*Measurable Goal Met by all Permittees, unless otherwise noted in the "Comments" column*	*Measurable Goal Not Met*	*Comments*
4-4.b	Provide educational programs that reach at least 20 construction firms each year.		X	A copy of the Powerpoint slides used in the educational presentation made during Year 2 associated with this BMP is included in Appendix L. During Year 2 it was not possible to find more than one organization that was willing to have an educational presentation made. This is because there are very few contractor organizations in the MRSWMP area, and the contractors that attended the presentations made in Year 1 were mostly the same people that belong to the other organizations. The organizations to which the Year 1 presentations were made did not feel there was sufficient interest in having a repeat presentation made during Year 2, and the other organizations, with one exception, felt that their members had already attended the Year 1 presentation by virtue of being members of those other organizations. In Year 2 the presentation was made to the National Association of the Remodeling Industry (NARI) on June 11, 2008. Approximately 15 persons attended the presentation, representing approximately 10 different firms. The Measurable Goal was not fully achieved, for the reasons stated above.

iii. Appropriateness

All of the BMPs under this MCM were considered to be appropriate for achieving the objective of preparing to undertake construction site storm water pollution prevention activities beginning

in Permit Year 2.

iv. Effectiveness

All of the BMPs under this MCM were considered to be effective for achieving the objective of reducing or eliminating construction site storm water pollution. The most effective BMP during the current reporting period were the site inspections that were performed under BMP 4-3.b. BMP 4-4.a was also effective in helping to mitigate storm water pollution emanating from construction sites, as reported by the public or permittee staff members, although very few such reports were received. The individual permittee activities on these BMPs are described in the information on each individual co-permittee included in the Appendices.

The effectiveness of the BMPs under this MCM is described in the Section titled "Effectiveness Assessment."

v. Proposed Modifications

BMP 4-4.b: As reported under BMP 4-4.b, the organizations to which educational presentations to construction contractors can be made have essentially all been reached, and there is little interest in having further presentations. Therefore, it is proposed to discontinue further Contractor presentations beginning in Year 3.

BMP 4-3.b: Under BMP 4-3.b the BMP and Measurable Goal commitments are to use the procedures and checklists contained on pages E-127 through E-136 of Appendix E of the MRSWMP to perform the construction site inspections. During Year 2 it was difficult for the Building Departments and Building Inspection staffs of the permittees to integrate the detailed construction site plan review and inspection procedures, which are contained in the MRSWMP, into their standard operating procedures.

Early during Year 3 it is proposed that representatives of these departments, whose personnel actually perform the work of BMP 4-3.b, meet to develop a revised approach to accomplishing the objectives of this BMP by doing this work in a manner that is more easily integrated into their existing procedures. The outcome of this discussion will be used to modify this BMP, and the modification will be reported on in the Year 3 Annual Report.

b. Presentation of the results of information collected and analyzed, if any, during the reporting period, including any monitoring data used to assess the success of the program at reducing the discharge of pollutants to the MEP.

No monitoring was conducted under this MCM. The Appendices contain information from each of the co-permittees pertaining to this MCM.

In preparing this section of the Annual Report the following questions pertinent to this Minimum Control Measure were considered, and the responses to each of them are presented.

Question: What is the process for taking enforcement actions for construction site violations, including the types of actions that are taken and the procedures for resolving them.
Response: The enforcement processes are described under Division V "Enforcement" of the ordinances adopted by the co-permittees, as described on pages E-95 through E-98 of Appendix E to the MRSWMP. The procedures for conducting site plan reviews and site inspections is described on pages E-125 through E-130 in Appendix E to the MRSWMP. The site plan review process, and conducting construction site inspections, is intended to ensure that each site will have the appropriate storm water pollution prevention measures in place throughout the construction period. The enforcement actions taken by each co-permittee are described in their respective Appendices. To date in most cases only warnings and educational directives have been necessary to persuade construction contractors into correcting observed deficiencies in their storm water pollution prevention programs. There appear to be fewer and fewer instances where inspectors are finding violations. This appears to be in part a result of the educational presentations that have been made, and a generally increased awareness in the construction industry of the need to use BMPs to prevent storm water pollution. Many of the contractor organizations are being educated on these issues through their newsletters and professional journals.

Question: Are the enforcement actions appropriate for the violations?
Response: Yes. In most instances the violating construction contractor was cooperative and willing to take the necessary corrective action upon receiving a warning notice from the inspector. However, recurring violations will lead to more severe enforcement action, as described under the response to the question above.

Question: Are they too harsh to typically be invoked or too lenient to provide deterrence?
Response: No, as noted above to date the vast majority of violators have been cooperative.

Question: How does the amount of resources spent on education compare to the amount spent on enforcement?
Response: With the commencement of construction site inspections in Year 2, much more money is being spent on implementing the inspection procedures than is being spent on educational presentations. It is being found to be a significant undertaking to integrate all of the storm water pollution prevention measures required under the MRSWMP into the building plan review and site inspection processes in each of the co-permittee's organizations. Efforts to complete this integration process are likely to continue into Year 3.

Question: How do you track the issuance of grading permits, building permits, and other

construction-related permits.

Response: Each of the co-permittees has its own issuing and tracking procedures. The Building Department, Community Development Department, and/or Public Works Department within each jurisdiction issue all of the construction-related permits. Each permit has a unique permit number, which is entered into the jurisdiction's tracking system along with the specific information about the construction site to which the permit pertains. When inspectors go to the construction site, they bring with them this information, which includes any storm water pollution prevention requirements that were made a condition of the permit at its time of issuance.

c. Brief summary of the storm water activities planned to be undertaken during the next reporting cycle, along with an implementation schedule, and justification for any proposed activities that differ from those originally proposed in the approved MRSWMP.

The activities under this MCM that will be carried out during Year 3 are summarized in the following table.

BMP Description	BMP No.	Implementation Plan	Proposed Measurable Goal	Modified?		Schedule	
				YES	NO	Complete this year	Ongoing Implementation
Implement procedures for site plan review, including consideration of potential water quality impacts	4-2.a	Train appropriate staff on the site plan and construction inspection procedures contained on pages E-125 through E-131 of Appendix E of the MRSWMP procedures	100 % of existing appropriate staff trained by Year 2, then all new appropriate employees every year after that		X		X
Implement procedures for site plan review, including consideration of potential water quality impacts	4-2.b	Use the site plan review procedures contained on pages E-100 through E-103 and E-125 through E-131 of Appendix E of the MRSWMP when reviewing construction projects	100% of construction site plans reviewed for compliance		X		X

BMP Description	BMP No.	Implementation Plan	Proposed Measurable Goal	Modified?		Schedule	
				YES	NO	Complete this year	Ongoing Implementation
Implement procedures for site inspection and enforcement of BMP control measures	4-3.a	Train appropriate staff on the construction site inspection procedures. Topics to be covered in this training will be the applicable portions of the materials contained on pages E-125 through E-136 of Appendix E of the MRSWMP, consisting of: 1. The Guidance Document for Policies and Procedures Pertaining to Construction Sites 2. Construction Site Plan Review and Inspection Procedures 3. Inspection Checklist for Construction Sites	100 % of existing appropriate staff trained by Year 2, then all new appropriate employees every year after that, with periodic refresher training provided		X		X
Implement procedures for site inspection and enforcement of BMP control measures.	4-3.b	Using the procedures and checklists contained on pages E-127 through E-136 of Appendix E of the MRSWMP, inspect the construction sites subject to the storm water ordinance and take appropriate action to have any observed violations corrected	100% of construction sites subject to the storm water ordinance inspected in accordance with inspection frequencies listed on page E-129 of Appendix E of the MRSWMP, and violations corrected [NOTE: A REVISION TO THIS MEASURABLE GOAL IS BEING DEVELOPED]	X			X

BMP Description	BMP No.	Implementation Plan	Proposed Measurable Goal	Modified?		Schedule	
				YES	NO	Complete this year	Ongoing Implementation
Implement procedures for receipt and consideration of information submitted by the public regarding storm water runoff impacts associated with construction projects.	4-4.a	Use the procedures contained on pages E-30 through E-33 of Appendix E of the MRSWMP to facilitate the receipt of, and the response to, reports from the public of storm water pollution from construction sites.	100% of all reports of construction site storm water pollution investigated and report on outcome of each case in the form of “closed”, “ongoing enforcement”, or “still investigating source”.		X		X

BMP Description	BMP No.	Implementation Plan	Proposed Measurable Goal	Modified?		Schedule	
				YES	NO	Complete this year	Ongoing Implementation
Implement a permit boundary-wide education program addressing the negative effects on water quality from improperly managed construction site runoff.	4-4.b	Twice per year at construction contractor professional meetings, present an educational program regarding prevention of storm water pollution from construction sites. The program will cover the four guiding principles for controlling runoff from construction sites, which are included in the BMP Guidance Series: • Construction site planning • Minimization of soil movement • Capturing of Sediment • Good housekeeping practices At these presentations handouts describing construction site permitting procedures and construction site BMPs will also be distributed.	This BMP has been effectively completed, and will be discontinued starting in Year 3	X			X

5. POST-CONSTRUCTION STORM WATER MANAGEMENT

BMP Description	*BMP No.*	*Implementation Plan*	*Status*					
			Implemented	Not Applicable	Modified	Effective	Unknown	Not Effective
Adopt an ordinance with standards for storm water pollution prevention associated with storm water systems installed in new developments and redevelopments.		**[Note: This is not a BMP for Year 2, but some entities had not completed implementing their ordinances in Year 1, so this BMP is again being reported on in Year 2]**						
Ordinance to include standards for the design, operation, and maintenance of post-construction storm water pollution prevention systems in new developments and redevelopment.	5-1.a	Using the guidance document and model ordinance contained on pages E-84 through E-98 and E-137 through E-143 of Appendix E of the MRSWMP, each Participating Entity will adopt a storm water ordinance revised to be specific to each entity's needs through appropriate governing body procedures.	X	X				
Implement procedures for review of project plans	5-2.a	Train appropriate staff on the plan review procedures contained on pages E-139 through E-143 of Appendix E	X			X		
Implement a permit boundary-wide education program addressing the negative effects on water quality from improperly managed construction site runoff.	5-4.a	Present an educational program to design professionals regarding prevention of storm water pollution from New Development and Redevelopment Projects. The program will cover the principles for controlling runoff from such projects, as described in the BMP Guidance Series for New Development and Redevelopment.	X			X		

a. BMPs

i. General Summary

The New Development and Redevelopment project requirements for storm water pollution prevention do not go into effect until Permit Year 3. In anticipation of this, training was conducted toward the end of Permit Year 2 for those co-permittee staff members who will be involved in reviewing the design documents for these types of projects, so they will be properly prepared to conduct those reviews beginning in Permit Year 3.

Because the requirements have not yet gone into effect, there has been no experience to indicate how successful they will be. However, based on the experience of other entities who have imposed these requirements, as the measures required by the ordinances become implemented it is anticipated that there will be some reduction in storm water pollution emanating from future projects of these types.

ii. Status of Measurable Goals

BMP No.	***Measurable Goal***	***Measurable Goal Met by all Permittees, unless otherwise noted in the "Comments" column***	***Measurable Goal Not Met***	***Comments***
5-1.a	Date ordinance implemented (implemented within 3 months of permit coverage for all entities except Monterey County, which will implement within 6 months of permit coverage)	X		See comments under the Measurable Goal for BMP 3-4.a.
5-2.a	100% of existing appropriate staff trained by Year 2, then all new appropriate staff thereafter	X		With the exception of the City of Sand City, all co-permittees had staff attend this training session which was held on August 14, 2008. A copy of the Power Point slides used in this training session is contained in Appendix L. Information on each individual co-permittee regarding this Measurable Goal is included in the Appendices.

BMP No.	*Measurable Goal*	*Measurable Goal Met by all Permittees, unless otherwise noted in the "Comments" column*	*Measurable Goal Not Met*	*Comments*
5-4.a	Provide educational programs that reach at least 10 firms that are engaged in the design of storm water pollution prevention components of New Development and Redevelopment projects within the area covered by the MRSWMP.	X		A presentation was made to the local Chapter meeting of the California Society of Professional Engineers on June 12, 2008. It was learned that most local project designers and/or architects will look to engineers, such as those who attended this meeting, to design the site improvements which would include many of the storm water BMPs. 28 persons, representing 8 separate firms or entities, attended this presentation. A copy of the Power Point slides used in the presentation is contained in Appendix L. An effort was made to make a similar presentation to the local Chapter of the American Institute of Architects (AIA) but in spite of numerous offers to make the presentation, no acceptance from the AIA Chapter to make the presentation was ever received. Although the Measurable Goal was not quite fully achieved, the turnout for the presentation was excellent and there was substantial interest shown on the part of the attendees.

iii. Appropriateness

Because the requirements have not yet gone into effect, there has been no experience to indicate

how appropriate they will be.

iv. Effectiveness

Because most of the requirements under this MCM have not yet gone into effect, there has been no experience to indicate how effective they will be.

The effectiveness of the few BMPs that have been implemented under this MCM is described in the Section titled "Effectiveness Assessment."

v. Proposed Modifications

No modifications are proposed to the BMPs or Measurable Goals within this minimum control measure.

b. Presentation of the results of information collected and analyzed, if any, during the reporting period, including any monitoring data used to assess the success of the program at reducing the discharge of pollutants to the MEP.

Under this Minimum Control Measure the only BMP that was scheduled for implementation in the current reporting period was BMP 5-2.a, staff training. The plan review procedures and other New Development/Redevelopment Project requirements contained in the BMP Guidance Series, which is referred to in the Storm Water Ordinance, will go into effect in Permit Year Three.

c. Brief summary of the storm water activities planned to be undertaken during the next reporting cycle, along with an implementation schedule, and justification for any proposed activities that differ from those originally proposed in the approved MRSWMP.

During Permit Year 3, the policies and procedures to enforce the requirements pertaining to Post-Construction Storm Water Management will be implemented.

The activities under this MCM that will be carried out during Year 2 are summarized in the following table.

BMP Description	BMP No.	Implementation Plan	Proposed Measurable Goal	Modified?		Schedule	
				YES	NO	Complete this year	Ongoing Implementation
Implement procedures for review of project plans	5-2.a	Train appropriate staff on the plan review procedures contained on pages E-139 through E-143 of Appendix E of the MRSWMP	100% of existing appropriate staff trained by Year 2, then all new appropriate staff thereafter		X		
	5-2.b	Using the plan review procedures contained on pages E-139 through E-143 of Appendix E, review 100% of project plans subject to the post-construction requirements of the storm water ordinance for compliance with this ordinance during design and construction	100% of applicable site plans reviewed for compliance				
Implement procedures for post-construction site inspection and enforcement of storm water pollution control systems	5-3.a	Use the BMP Guidance Series and site inspection checklists contained on pages E-104 through E-118 and E-144 through E-145 of Appendix E to inspect projects and/or require self-certification by owner following completion of construction.	100% of applicable sites inspected or self-certified by project owner				

6. POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

BMP Description	*BMP No.*	*Implementation Plan*	*Status*					
			Implemented	Not Applicable	Modified	Effective	Unknown	Not Effective
Implement an education and training program for employees (general and then specific to targeted employee groups, including supervisors) about the impacts of storm water pollution from municipal activities and hazardous materials disposal, and how to implement the selected BMPs to reduce these impacts.	6-1.a	Using the training outline and materials contained on pages F-22 through F-34 of Appendix F of the MRSWMP, train appropriate municipal employees (including supervisors) on storm water pollution issues.	X			X		
Inspection program of municipal hazardous materials storage facilities	6-2.a	Promptly correct any hazardous materials inspection deficiencies reported by the County inspectors, who are responsible for all of the hazardous materials inspections in Monterey County. (The inspection forms used by the County are contained on pages E-146 through E-168 of Appendix E of the MRSWMP and indicate the thoroughness that the County's inspections entail.)	X			X		
Implement procedures for proper disposal of used motor oil and oil filters	6-3.a	Train appropriate staff on the procedures contained on pages E-169 through E-174 of Appendix E for proper disposal of used motor oil and filters	X			X		
	6-3.b	Use procedures contained on pages E-169 through E-174 of Appendix E for disposal of used motor oil and filters	X			X		

BMP Description	*BMP No.*	*Implementation Plan*	*Status*					
			Implemented	Not Applicable	Modified	Effective	Unknown	Not Effective
Implement a program that effectively manages landscaping and lawn care activities to minimize the potential for storm water pollution.	6-4.a	Train municipal staffs to use the procedures contained on pages E-175 through E-176 of Appendix E of the MRSWMP to properly manage landscape and lawn care activities. Offer training to other agencies such as school districts beginning in Year 3.	X			X		
	6-4.b	Perform spraying during times where rain is not predicted	X			X		
Implement procedures to ensure the dechlorination and/or debromination of pool water prior to discharge to the storm water system	6-5.a	Use the procedures contained on pages E-177 through E-179 of in Appendix E of the MRSWMP for the proper disposal of swimming pool water.	X			X		
Conduct sweeping on a frequent and regular basis and focus sweeping schedule on high impact/dry weather sites	6-6.a	Conduct sweeping on a regular basis in accordance with the programs and plans contained on pages E-180 through E-196 of Appendix E of the MRSWMP.	X			X		
	6-6.b	Twice during the 5-year permit period, perform an analysis for pollutants of concern in material removed from streets by sweeping	X			X		
Implement a program to prevent pollutants from automotive activities, such as vehicle fluids, from entering storm drains	6-7.a	Provide designated area for all vehicle maintenance.	X			X		
	6-7.b	Move maintenance and repair activities indoors or under a covered area whenever possible	X			X		
	6-7.e	Using the Vehicle Service Facilities Inspection Checklist contained on pages E-71 through E-77 of Appendix E of the MRSWMP, inspect the MS4's vehicle maintenance facilities annually and correct any deficiencies noted.	X			X		
	6-7.f	Store materials and wastes under cover whenever possible	X			X		
	6-7.g	Train all employees repairing municipal vehicles on proper pollution prevention techniques	X			X		

BMP Description	*BMP No.*	*Implementation Plan*	*Status*					
			Implemented	Not Applicable	Modified	Effective	Unknown	Not Effective
Implement a program to prevent pollutants from washing municipal vehicles, such as vehicle fluids and phosphate soaps, from entering storm drains.	6-8.b	Using the vehicle washing portion of the Vehicle Service Facilities Inspection Checklist contained on pages E-75 through E-76 of Appendix E of the MRSWMP, inspect the MS4's vehicle washing facilities annually and correct any deficiencies noted.	X			X		
Implement policies and procedures to prevent pollutants from bridge and street maintenance activities, such as paving and painting work, from entering storm drains	6-9.a	Require bridge and street maintenance contractors to regularly sweep construction zones and to keep paint and other construction materials out of the storm drain system. (Perform additional sweeping in conjunction with street and bridge maintenance work that is performed in-house.)	X			X		
Implement a program of regularly cleaning storm drains and inlets to prevent accumulated pollutants from being discharged with the storm water (See Appendix E of the MRSWMP for a complete discussion of the work to be performed under BMP 6-10	6-10.a	Stencil catch basins and inlets as needed as prevention measure	X			X		
	6-10.b	Inspect catch basins and inlets in the designated "hot spots" listed on page E-199 of Appendix E of the MRSWMP annually prior to rainy season, and clean as necessary	X			X		
	6-10.c	Clean and repair catch basins, inlets and piping as identified through inspections prior to November 1st annually	X			X		
	6-10.d	Re-inspect identified problem areas of debris accumulation during wet season	X			X		
	6-10.e	Keep documentation of inspections and cleanings	X			X		
	6-10.f	Twice during the 5-year permit period, perform an analysis for pollutants of concern in material removed from catch basins by cleaning	X			X		

BMP Description	*BMP No.*	*Implementation Plan*	*Status*					
			Implemented	Not Applicable	Modified	Effective	Unknown	Not Effective
Implement a program to regularly inspect and clean trash enclosures and parks to prevent trash from being discharged with the storm water	6-11.a	Regularly inspect and clean trash enclosures	X			X		
	6-11.b	Regularly inspect and clean parks	X			X		

a. BMPs

i. General Summary

All of the BMPs under this MCM were considered to be successful in helping to achieve the objective of reducing storm water pollution emanating from municipal operations. The level of success varied between the co-permittees, due to their individual characteristics and sizes of facilities. For example, some of the smaller co-permittees have very small public works departments and very small corporation yards, and thus would have much less potential to be significant storm water pollution sources than would be the same facilities and operations in the larger jurisdictions.

ii. Status of Measurable Goals

BMP No.	*Measurable Goal*	*Measurable Goal Met by all Permittees, unless otherwise noted in the "Comments" column*	*Measurable Goal Not Met*	*Comments*
6-1.a	100 % of existing appropriate staff trained by Year 2, then all new employees every year after that. Perform pre- and post-training testing to measure training effectiveness.	X		Group training for this BMP was provided during Year 1, as reported in the Year 1 Annual Report. In Year 2, training was provided as necessary to newly hired staff members. Information on each individual co-permittee regarding this Measurable Goal is included in the Appendices.
6-2.a	100% of noted deficiencies corrected within 30 days of notification by the County	X		Information on each individual co-permittee regarding this Measurable Goal is included in the Appendices.
6-3.a	100 % of existing appropriate staff trained by Year 2, then all new employees thereafter	X		Information on each individual co-permittee regarding this Measurable Goal is included in the Appendices.
6-3.b	Summary of used motor oil disposal activities included in the Annual Reports.	X		Information on each individual co-permittee regarding this Measurable Goal is included in the Appendices.

BMP No.	*Measurable Goal*	*Measurable Goal Met by all Permittees, unless otherwise noted in the "Comments" column*	*Measurable Goal Not Met*	*Comments*
6-4.a	Measures to minimize irrigation runoff, as described in Appendix E of the MRSWMP, applied to 80% or more of the irrigation sites under the jurisdiction's control	X		Group training for this BMP was provided during Year 1, as reported in the Year 1 Annual Report. During Year 2, Mr. Perry Tarsitano of the City of Monterey's Parks Department staff presented a refresher training session for this BMP, which was put on as a Group activity on March 11, 2008. Local school districts were invited to attend this training, and representatives from the Carmel Unified School District did attend. Mr. Tarsitano provided a review of IPM, landscape management, and irrigation issues required under this BMP. Information on each individual co-permittee regarding this Measurable Goal is included in the Appendices.
6-4.b	100% of spraying done when rain is not predicted	X		Information on each individual co-permittee regarding this Measurable Goal is included in the Appendices.
6-5.a	Pool water dechlorinated and/or debrominated prior to discharge to storm drain system 100% of the time	X		Information on each individual co-permittee regarding this Measurable Goal is included in the Appendices.

BMP No.	***Measurable Goal***	***Measurable Goal Met by all Permittees, unless otherwise noted in the "Comments" column***	***Measurable Goal Not Met***	***Comments***
6-6.a	100% of Sweeping in each MS4 performed in accordance with the MS4's Plan	X		Information on each individual co-permittee regarding this Measurable Goal is included in the Appendices. As a Group undertaking, print ads were placed in local newspapers to encourage residents not to park on their streets on the days when their streets were being swept. These ads were placed in the Saturday edition of the Monterey County Herald on May 17, 2008, and in the Carmel Pine Cone during the week of May 30-June 5, 2008.
6-6.b	Analyses performed in the indicated Years	X		This Measurable Goal was fulfilled as a Group activity. The Work Plan used to carry out the sampling program, and the analytical results from the sampling, are contained in Appendix M. The results of this work will be used by the entities from which samples were taken to evaluate the feasibility of modifying their street sweeping programs to determine whether this will reduce the discharge of pollutants in their storm water. That First Flush testing, performed under BMP 2-2.d, will provide the data to determine whether such modifications, if any are made, were effective in reducing the discharges of these pollutants.
6-7.a	100% of MS4s have designated area for vehicle maintenance	X		Information on each individual co-permittee regarding this Measurable Goal is included in the Appendices.

BMP No.	*Measurable Goal*	*Measurable Goal Met by all Permittees, unless otherwise noted in the "Comments" column*	*Measurable Goal Not Met*	*Comments*
6-7.b	100% maintenance and repair activities moved indoors or covered area whenever possible	X		Information on each individual co-permittee regarding this Measurable Goal is included in the Appendices.
6-7.e	100% of noted deficiencies corrected.	X		Information on each individual co-permittee regarding this Measurable Goal is included in the Appendices.
6-7.f	100% of materials stored under cover whenever possible	X		Information on each individual co-permittee regarding this Measurable Goal is included in the Appendices.
6-7.g	This training is included in BMP 6-1.a	X		See comments under the Measurable Goal for BMP 6-1.a.
6-8.b	100% of noted deficiencies corrected.	X		Information on each individual co-permittee regarding this Measurable Goal is included in the Appendices.
6-9.a	100% of bridge and street maintenance contracts contain these requirements, and in-house maintenance projects swept on a frequent basis to keep pollutants out of the storm drain system	X		Information on each individual co-permittee regarding this Measurable Goal is included in the Appendices.
6-10.a	Stenciling is covered under BMP 2-2.c	X		See comments under the Measurable Goal for BMP 2-2.c.
6-10.b	100% of "hot spot" catch basins and inlets inspected, and cleaned as necessary, each year prior to start of rainy season	X		Information on each individual co-permittee regarding this Measurable Goal is included in the Appendices.
6-10.c	By November 1st annually, address cleaning and repair needs of prioritized catch basins, inlets & piping as identified during inspections	X		Information on each individual co-permittee regarding this Measurable Goal is included in the Appendices.
6-10.d	Re-inspect 100% of problem areas	X		Information on each individual co-permittee regarding this Measurable Goal is included in the Appendices.
6-10.e	Documentation kept on file	X		Information on each individual co-permittee regarding this Measurable Goal is included in the Appendices.

BMP No.	*Measurable Goal*	*Measurable Goal Met by all Permittees, unless otherwise noted in the "Comments" column*	*Measurable Goal Not Met*	*Comments*
6-10.f	Analyses performed in the indicated Years	X		This Measurable Goal was fulfilled as a Group activity. The Work Plan used to carry out the sampling program, and the analytical results from the sampling, are contained in Appendix M. The results of this work will be used by the entities from which samples were taken to evaluate the feasibility of modifying their catch basin cleaning programs to determine whether this will reduce the discharge of pollutants in their storm water. That First Flush testing, performed under BMP 2-2.d, will provide the data to determine whether such modifications, if any are made, were effective in reducing the discharges of these pollutants.
6-11.a	100% of trash enclosures inspected per program described on page E-181 of Appendix E	X		Information on each individual co-permittee regarding this Measurable Goal is included in the Appendices.
6-11.b	100% of parks inspected per program described on page E-181 of Appendix E	X		Information on each individual co-permittee regarding this Measurable Goal is included in the Appendices.

ii. Appropriateness

All of the BMPs under this MCM were considered to be appropriate for helping to achieve the objective of reducing storm water pollution emanating from municipal operations.

As discussed on pages 4-13 and 4-14 of the MRSWMP, bacteria, metals, and orthophosphates are the *"Pollutants of Concern"* toward which certain BMPs are targeted. Under MCM No. 6, many of the BMPs are intended to reduce the discharge of these pollutants of concern. The Table below describes how each of these BMPs will help to control and reduce the discharge of these

pollutants.

BMP No.	Targeted Pollutant(s) of Concern	How this BMP Will Help to Control and Reduce Discharge of These Pollutants
6-1.a, 6-3.a, 6-4.a, 6-7.g, and 6-8.a	Bacteria, metals, and orthophosphates	Providing training to municipal employees on a wide range of procedures and techniques to avoid discharging these types of constituents will help to lower the levels of these pollutants in the storm drain discharges from each permittee.
6-2.a, 6-3.b, 6-4.a, 6-4.b, 6-5.a, 6-7.a, 6-7.b, 6-7.c, and 6-7.f	Bacteria and metals	Each of these BMPs will reduce or eliminate the discharge of these pollutants from municipal operations by providing improved procedures and policies, or by ensuring proper facilities are provided to prevent the discharge of these pollutants.
6-6.a and 6-6.b	Metals	These two BMPs will help to reduce the discharge of metals from street surfaces by removing such pollutants before they can be washed into the storm sewer by rainfall.
6-7.d and 6-10.a	Bacteria, metals, and orthophosphates	Making it clear to municipal employees that the discharges from storm drains within the corporation yards flow to a receiving water, coupled with enhanced employee awareness of the damage that can be caused by such discharges through their training under BMPs 6-1.a, 6-3.a, 6-4.a, 6-7.g, and 6-8.a, will help to reduce the discharges of these types of pollutants from municipal facilities.

BMP No.	Targeted Pollutant(s) of Concern	How this BMP Will Help to Control and Reduce Discharge of These Pollutants
6-7.e, 6-8.b, 6-10.b, 6-10.c, 6-10.d, 6-11.a, and 6-11.b	Bacteria, metals, and orthophosphates	Regularly inspecting municipal facilities and activities which may be discharging these pollutants, and then correct such problems if they are found to exist, will help to reduce the levels of these constituents in the storm water that is discharged to the receiving waters.

iv. Effectiveness

All of the BMPs under this MCM were considered to be effective in helping to reduce storm water pollution emanating from municipal operations. The level of effectiveness varied between the co-permittees, due to their individual characteristics and sizes of facilities. For example, some of the smaller co-permittees have very small public works departments and very small corporation yards, and thus would have much less potential to be significant storm water pollution sources than would be the same facilities and operations in the larger jurisdictions. Thus, the effectiveness of instituting the BMPs would be expected to be greater in the larger jurisdictions than in the smaller ones.

The effectiveness of the BMPs under this MCM is described in the Section titled "Effectiveness Assessment."

v. Proposed Modifications

[NOTE: MODIFICATIONS FOR CERTAIN OF THE BMPS AND/OR MEASURABLE GOALS UNDER THIS MINIMUM CONTROL MEASURE ARE BEING DEVELOPED FOR INCLUSION IN THE FINAL VERSION OF THIS ANNUAL REPORT]

b. Presentation of the results of information collected and analyzed, if any, during the reporting period, including any monitoring data used to assess the success of the program at reducing the discharge of pollutants to the MEP.

Monitoring was conducted under BMPs 6-6.b and 6-10.f. The sampling program was carried out in June, 2008 and consisted of the following:

BMP 6-6.b: Metals analyses were performed on a total of 12 street sweeping samples, with 4 samples each being taken within the areas tributary to the Steinbeck Plaza (Monterey), Ocean Avenue (Carmel), and Forest (Pacific Grove) outfalls. These outfalls were selected for

monitoring, because they were found to have the highest levels of each of these constituents in the 2007 First Flush monitoring. The 2007 First Flush monitoring results are contained in Appendix P.

BMP 6-10.f: Metals, *E. Coli*, and enterococcus analyses were performed on a total of 8 catch basin cleaning samples, with 4 samples each being taken within the areas tributary to the Steinbeck Plaza and Twin 51s sites (both in Monterey).

In most instances it was found that the levels of these pollutants were higher in certain parts of these watersheds. These three entities will evaluate the feasibility of increasing the frequency of cleaning or sweeping in those locations where the highest constituent values were found. This will be reported on in the Year 3 Annual Report.

Appendix M contains a complete description of the work that was performed and the results of this monitoring.

In preparing this section of the Annual Report the following questions pertinent to this Minimum Control Measure were considered, and the responses to each of them are presented.

Question: How are municipal programs and activities reviewed?
Response: In most entities the upper management level of each department develops its own programs and activities, through internal review within the department. Certain of these are reviewed by the entity's Manager and in some cases by its governing body of policymakers.

Question: How many changes were implemented?
Response: This is unknown. However, numerous changes were made in the area of record keeping and documentation, in order to carry out the BMPs and Measurable Goals under this MCM. Also, many activities were added and/or modified within numerous departments in order to carry out the BMPs and Measurable Goals under this MCM.

Question: How much debris is collected during street sweeping?
Response: For most entities this is unknown, as they do not track this parameter. The following is information from those entities that do collect this information:

- For the County from July, 2007 –June, 2008 approximately 1,427 cubic yards of material was collected during street sweeping.
- For the City of Seaside approximately 4 cubic yards is collected per day.
- For the City of Pacific Grove approximately 20 cubic yards is collected per week.

Question: Is this a decrease?
Response: For most entities this is unknown, as noted in the response to the previous question. For the County there was no observable decrease.

Question: Is more debris collected from certain streets in your jurisdiction than from others?
Response: Yes, although this is not tracked on a weight basis by most of the entities. For the County the amount of debris collected from the two maintenance districts is very similar. Many of the entities have found that the bulk of the material collected from sweeping in residential areas is tree leaves and needles, rather than trash. They also find that there is more debris

collected from flat spots and depressions where such debris collects.

Question: Have you experimented with increasing frequencies?
Response: Most of the entities have adjusted their sweeping programs in response to citizen input and/or direction from their governing bodies.

Question: What were the results?
Response: In most cases there were fewer citizen complaints after the sweeping programs were adjusted. For the County more debris was collected.

Question: Are parked cars a problem?
Response: In most jurisdictions yes. However, for some entities it is not possible to conduct street sweeping on a set sweeping schedule, due to limitations in the number of personnel trained to operate the sweeping equipment as well as the limited number of sweepers, which for some entities is just one. If sweeping personnel are absent, or if equipment is out of service for repairs, then the sweeping schedule has to be changed to reflect those conditions. Therefore, citizens become aware that sweeping does not always occur on the same day(s) of the week in their neighborhoods and thus are not inclined to try to keep their cars parked off the street on the scheduled sweeping days. In many entities it is not possible for residents to park off of the street, due to a lack of driveway and/or garage space. For these reasons, imposing a "No Parking on Street Sweeping Days" requirement in residential areas is not practical in many of the entities.

Question: Have the number of flood events increased or decreased during program implementation?
Response: The number of flood events does not appear to have changed during program implementation.

Question: Have there been changes in uses of landscaping fertilizers, pesticides, and herbicides?
Response: To only a small extent, as most of the entities were already practicing proper BMPs to minimize storm water pollution from these activities.

c. Brief summary of the storm water activities planned to be undertaken during the next reporting cycle, along with an implementation schedule, and justification for any proposed activities that differ from those originally proposed in the approved MRSWMP.

The activities under this MCM that will be carried out during Year 3 are summarized in the following table.

BMP Description	BMP No.	Implementation Plan	Proposed Measurable Goal	Modified?		Schedule	
				YES	NO	Complete this year	Ongoing Implementation
Implement an education and training program for employees (general and then specific to targeted employee groups, including supervisors) about the impacts of storm water pollution from municipal activities and hazardous materials disposal, and how to implement the selected BMPs to reduce these impacts.	6-1.a	Using the training outline and materials contained on pages F-22 through F-34 of Appendix F, train appropriate municipal employees (including supervisors) on storm water pollution issues.	100 % of existing appropriate staff trained by Year 2, then all new employees every year after that. Perform pre- and post-training testing to measure training effectiveness.		X		X

BMP Description	BMP No.	Implementation Plan	Proposed Measurable Goal	Modified?		Schedule	
				YES	NO	Complete this year	Ongoing Implementation
Inspection program of municipal hazardous materials storage facilities	6-2.a	Promptly correct any hazardous materials inspection deficiencies reported by the County inspectors, who are responsible for all of the hazardous materials inspections in Monterey County. (The inspection forms used by the County are contained on pages E-146 through E-168 of Appendix E of the MRSWMP and indicate the thoroughness that the County's inspections entail.)	100% of noted deficiencies corrected within 30 days of notification by the County		X		X
Implement procedures for proper disposal of used motor oil and oil filters	6-3.a	Train appropriate staff on the procedures contained on pages E-169 through E-174 of Appendix E of the MRSWMP for proper disposal of used motor oil and filters	100 % of existing appropriate staff trained by Year 2, then all new employees thereafter		X		X
Implement procedures for proper disposal of used motor oil and oil filters	6-3.b	Use procedures contained on pages E-169 through E-174 of Appendix E of the MRSWMP for disposal of used motor oil and filters	Summary of used motor oil disposal activities included in the Annual Reports.		X		X

BMP Description	BMP No.	Implementation Plan	Proposed Measurable Goal	Modified?		Schedule	
				YES	NO	Complete this year	Ongoing Implementation
Implement a program that effectively manages landscaping and lawn care activities to minimize the potential for storm water pollution.	6-4.a	Train municipal staffs to use the procedures contained on pages E-175 through E-176 of Appendix E of the MRSWMP to properly manage landscape and lawn care activities. Offer training to other agencies such as school districts beginning in Year 3.	Measures to minimize irrigation runoff, as described in Appendix E of the MRSWMP, applied to 80% or more of the irrigation sites under the jurisdiction's control		X		X
	6-4.b	Perform spraying during times where rain is not predicted	100% of spraying done when rain is not predicted		X		X
Implement procedures to ensure the dechlorination and/or debromination of pool water prior to discharge to the storm water system	6-5.a	Use the procedures contained on pages E-177 through E-179 of in Appendix E of the MRSWMP for the proper disposal of swimming pool water.	Pool water dechlorinated and/or debrominated prior to discharge to storm drain system 100% of the time		X		X
Conduct sweeping on a frequent and regular basis and focus sweeping schedule on high impact/dry weather sites	6-6.a	Conduct sweeping on a regular basis in accordance with the programs and plans contained on pages E-180 through E-196 of Appendix E of the MRSWMP.	100% of Sweeping in each MS4 performed in accordance with the MS4's Plan		X (See footnote 1)		X

BMP Description	BMP No.	Implementation Plan	Proposed Measurable Goal	Modified?		Schedule	
				YES	NO	Complete this year	Ongoing Implementation
Implement a program to prevent pollutants from automotive activities, such as vehicle fluids, from entering storm drains	6-7.a	Provide designated area for all vehicle maintenance.	100% of MS4s have designated area for vehicle maintenance		X		X
	6-7.b	Move maintenance and repair activities indoors or under a covered area whenever possible	100% maintenance and repair activities moved indoors or covered area whenever possible		X		X
	6-7.c	Install separators in vehicle yards as necessary and required.	Oil separators added to yards as needed.		X		X
	6-7.e	Using the Vehicle Service Facilities Inspection Checklist contained on pages E-71 through E-77 of Appendix E of the MRSWMP, inspect the MS4's vehicle maintenance facilities annually and correct any deficiencies noted.	100% of noted deficiencies corrected.		X		X
	6-7.f	Store materials and wastes under cover whenever possible	100% of materials stored under cover whenever possible		X		X
	6-7.g	Train all employees repairing municipal vehicles on proper pollution prevention techniques	This training is included in BMP 6-1.a.		X		X

BMP Description	BMP No.	Implementation Plan	Proposed Measurable Goal	Modified?		Schedule	
				YES	NO	Complete this year	Ongoing Implementation
Implement a program to prevent pollutants from washing municipal vehicles, such as vehicle fluids and phosphate soaps, from entering storm drains.	6-8.a	Training of municipal employees in proper vehicle washing techniques.	This training is included in BMP 6-1.a.		X		X
Implement a program to prevent pollutants from washing municipal vehicles, such as vehicle fluids and phosphate soaps, from entering storm drains.	6-8.b	Using the vehicle washing portion of the Vehicle Service Facilities Inspection Checklist contained on pages E-75 through E-76 of Appendix E of the MRSWMP, inspect the MS4's vehicle washing facilities annually and correct any deficiencies noted.	100% of noted deficiencies corrected.		X		X
Implement policies and procedures to prevent pollutants from bridge and street maintenance activities, such as paving and painting work, from entering storm drains	6-9.a	Require bridge and street maintenance contractors to regularly sweep construction zones and to keep paint and other construction materials out of the storm drain system. (Perform additional sweeping in conjunction with street and bridge maintenance work that is performed in-house.)	100% of bridge and street maintenance contracts contain these requirements, and in-house maintenance projects swept on a frequent basis to keep pollutants out of the storm drain system		X		X

BMP Description	BMP No.	Implementation Plan	Proposed Measurable Goal	Modified?		Schedule	
				YES	NO	Complete this year	Ongoing Implementation
Implement a program of regularly cleaning storm drains and inlets to prevent accumulated pollutants from being discharged with the storm water (See Appendix E of the MRSWMP for a complete discussion of the work to be performed under BMP 6-10	6-10.a	Stencil catch basins and inlets as needed as prevention measure	Stenciling is covered under BMP 2-2.c		X		X
	6-10.b	Inspect catch basins and inlets in the designated "hot spots" listed on page E-199 of Appendix E of the MRSWMP annually prior to rainy season, and clean as necessary	100% of "hot spot" catch basins and inlets inspected, and cleaned as necessary, each year prior to start of rainy season		X		X
	6-10.c	Clean and repair catch basins, inlets and piping as identified through inspections prior to November 1st annually	By November 1st annually, address cleaning and repair needs of prioritized catch basins, inlets & piping as identified during inspections		X		X
	6-10.d	Re-inspect identified problem areas of debris accumulation during wet season	Re-inspect 100% of problem areas		X		X
	6-10.e	Keep documentation of inspections and cleanings	Documentation kept on file		X		X
Implement a program to regularly inspect and clean trash enclosures and parks to prevent trash from being discharged with the storm water	6-11.a	Regularly inspect and clean trash enclosures	100% of trash enclosures inspected per program described on page E-181 of Appendix E		X		X
	6-11.b	Regularly inspect and clean parks	100% of parks inspected per program described on page E-181 of Appendix E		X		X

Effectiveness Assessment

The effectiveness of the MRSWMP BMPs was assessed using the California Stormwater Quality Association's (CASQA) guidelines contained in the CASQA publication titled "Municipal Stormwater Program Effectiveness Guide." The following is a brief overview of the CASQA effectiveness assessment process.

The CASQA Effectiveness Assessment is a process to evaluate whether BMPs are resulting in desired Outcomes (or meeting performance standards) and if these Outcomes are being achieved efficiently and cost-effectively. The assessment is performed for different Outcome Levels, which are depicted in the figure on the following page.

Outcomes refer to the results of a control measure, program element, or overall program and have been categorized into the six Outcome Levels shown in the figure. Although each Level has value in informing and/or supporting management decisions, not all Outcome Levels are used in every assessment and the Outcome Levels are not necessarily conducted in sequence. The six Levels are described below.

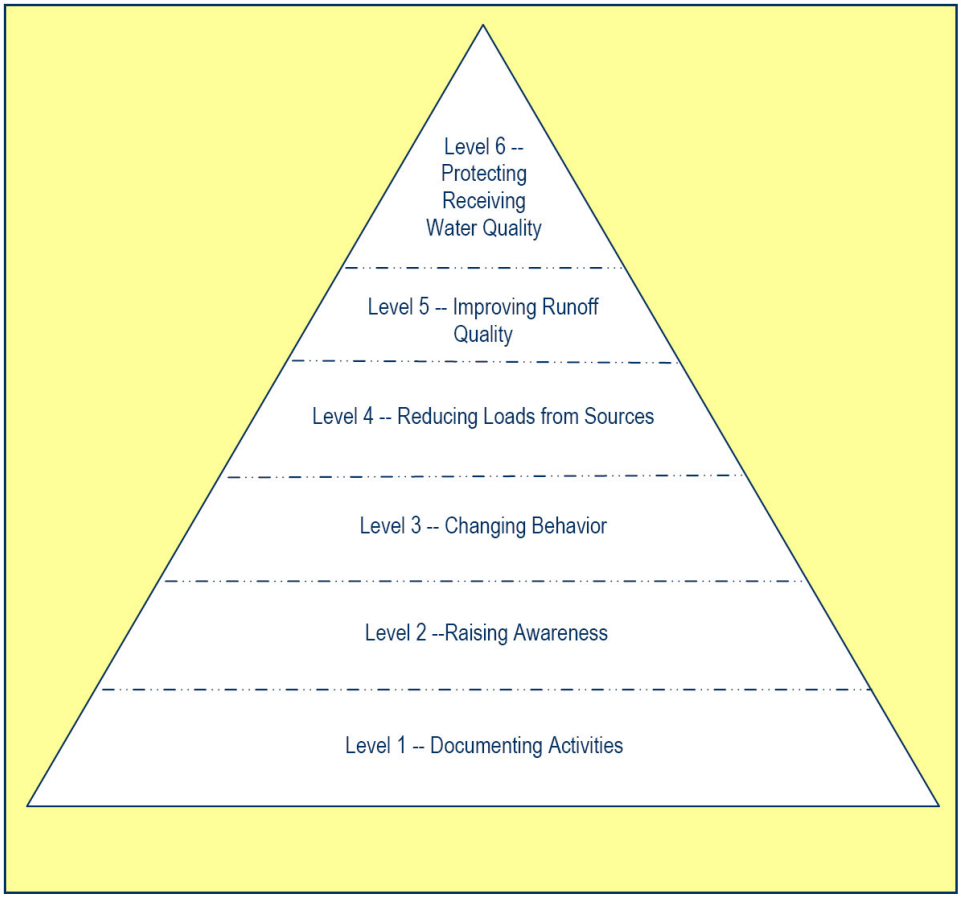
The purpose of this effectiveness assessment process is to confirm the desired results of the overall program, and to identify modifications that may be needed, thus ensuring the iterative process is used as an effective management tool throughout the permit implementation. The following primary questions, or Outcome Levels, help to categorize and describe the desired results of the program:

- Level 1 Outcome – Was the Program Element implemented in accordance with the Permit Provisions and SWMP?
- Level 2 Outcome – Did the Program Element raise the target audience's awareness of an issue?
- Level 3 Outcome – Did the Program Element change a target audience's behavior, resulting in the implementation of recommended BMPs?
- Level 4 Outcome – Did the Program Element reduce the load of pollutants from the sources to the storm drain system?
- Level 5 Outcome – Did the Program Element help to improve runoff quality?
- Level 6 Outcome – Did the Program Element help to protect receiving water quality?

Although each level has value in informing and/or supporting management decisions, not all Outcome Levels are used and the Outcome Levels are not necessarily conducted in sequence. In some cases, assessments at different levels may occur at once.

At this early stage of implementation of the MRSWMP, it is not expected that any of the BMPs will be able to demonstrate success above Level 4. Therefore, the summary tables for each MCM only go up to Level 4. In future Annual Reports, if any of the BMPs demonstrate success above Level 4, the tables will be expanded to include higher levels.

EFFECTIVENESS LEVELS



Source: CASQA "Municipal Stormwater Program Effectiveness Guide," May 2007.

MCM 1.0 Public Education and Outreach

The Public Education and Outreach portion of the Storm Water Management Program focuses on communicating consistent messages regarding storm water quality to a broad audience. The BMPs implemented for this minimum control measure were intended to teach the public the importance of protecting storm water quality, both for the benefit of the environment and human health.

Although its effectiveness can be difficult to measure, public education is essential to achieving behavioral changes that can protect water quality. Because the MRSWMP focuses on non-point source pollution, the individual person plays a key role in preventing this pollution. The BMPs selected for implementation educate community members about steps they can take both at work and at home to prevent and reduce water pollution.

The only BMP established under this MCM for the current reporting period is BMP 1-1.b. This BMP covers the full scope of the Public Education and Outreach Plan, which is discussed in detail in Appendix A. In the table on pages A-6 and A-7 of Appendix A there is a list of each "Program Activity/Target" which in essence comprise the BMPs within the Public Education and Outreach Plan. Hence, each Program Activity/Target in that table is discussed below in order to assess its effectiveness. Much more detail and discussion on each of these program activities is contained in Appendix A, and for brevity is not repeated here.

1. School Outreach K-12:

- *1.1-Grades K-3: Distribute educational materials*: 25 classroom visits were conducted reaching 522 students, and 854 educational materials focused on preventing storm water pollution were distributed. This Program Activity was successful at Levels 1 and 2.

  1.2-Grades 4-8: Provide hands-on class visits: Presentations on storm water pollution prevention topics were made during visits to 69 classrooms covering grades K-college. These presentations reached approximately 1,914 students. Approximately half of these were to students in the 4-8 grade levels. This Program Activity was successful at Levels 1 and 2.

  1.3-Grades 9-College: Perform storm drain stenciling: Because of interest in storm drain stenciling expressed by students in grades lower than 9, this Program Activity was expanded to include students down to grade 4. The bilingual signs that say "No Dumping" raise awareness about the connection between storm drains and receiving waters and they help deter littering, dumping, and other practices that contribute to non-point source pollution. 159 students in this range of grades participated in storm drain stenciling, devoting 364 volunteer hours to this effort. This Program Activity was successful at Levels 1 and 2.

  1.4-Conduct Teacher Training: SEA has tried unsuccessfully to offer teacher trainings for the three local school districts have been unsuccessful for the past 2 years.
  All three school districts were contacted one or more times, but not one of them agreed to any formal teacher trainings. Through the 69 classroom presentations given to grade levels K-College with the hands-on watershed model, teachers were trained informally. In its previous configuration and approach, the Teacher Training Program Activity was

considered to be ineffective. For this reason it is proposed to modify this Program Activity during the next reporting period as follows:

In Year 3, the Public Education and Outreach Program Coordinator will contact the three school district Regional Occupational Program (ROP) Coordinators to provide outreach for the ROP classes associated with hospitality, auto repair, or other business related courses that may influence stormwater pollution. The Coordinator will offer presentations, educational materials and surveys to participants. Survey responses will then be used to help measure effectiveness of this outreach tool.

2. Sea Otter Mortality: Sea otter mortality in the Monterey Bay National Marine Sanctuary is of great concern. It is believed that certain types of pollution that may be coming from urbanized areas contributes to this condition. For example, flushable cat litter may be a contributor as cysts may pass through the wastewater treatment plant processes and be discharged to the ocean where they may be ingested by sea otters.

The bilingual educational brochure *Monterey Bay Begins on Your Street* addresses pet waste. The brochure was reprinted with the additional message, "Do not flush cat litter," as a preventative measure. The brochure changes were shared with the MBNMS to have consistent messages. Links to sea otter organizations and other educational sites and resources are updated on the SEA website www.montereysea.org. This Program Activity was successful at Levels 1 and 2.

3. Selected BMP Brochures: Numerous focused BMP brochures were prepared covering the following topics:

- Automotive Maintenance & Car Care
- Food Service Industry
- Earth-Moving Activities
- Fresh Concrete & Mortar Application
- General Construction & Site Supervision
- Heavy Equipment Operation
- Painting & Application of Solvents & Adhesives
- Roadwork & Paving
- Car Care for Do-It-Yourselfers
- Home Maintenance Tips
- Home Repair & Remodeling
- Landscaping & Gardening
- Pest Control Tips

A total of 789 of these brochures were distributed. In addition 244 posters pertaining to storm water pollution from automotive and restaurant businesses were distributed, along with 40 generalized storm drain discharge posters. 191 DVDs pertaining to storm water pollution prevention in restaurants were also delivered to restaurants. This Program Activity was successful at Levels 1 and 2, and based on the findings of business inspections conducted under BMP 3-3.b, it was also successful at Level 3.

4. Residential Outreach: City newsletters and other forms of advertising and communication were used to inform residents about specific storm water issues. The following is a summary of the residential outreach that was conducted:

- City Newsletters reached an estimated 48,300 residents and informed them of topics including the importance of street sweeping, improper discharges to storm drains, and "green" gardening.
- Television programs describing the Urban Runoff Diversion program in the City of Pacific Grove were aired on three local television stations.
- Educational materials on preventing residential storm water pollution were emailed to approximately 500 city staff members.
- A workshop was held to describe to the public the storm water pollution prevention work that was carried out under the MRSWMP during the first year of the NPDES permit. Although the in-person attendance at the workshop was small, the workshop was recorded and aired a total of 68 times on the local public access cable channel. Numerous members of the public reported that they had viewed all or portions of the workshop on this cable channel.

This Program Activity was successful at Levels 1 and 2.

5. Household Hazardous Waste Services in Monterey County: Because household hazardous waste programs are implemented by several other local agencies, education on this topic is carried out by those agencies and is not carried out under the MRSWMP. Based on information available from those agencies, which include Monterey Disposal and Waste Management refuse collection companies whose franchises cover much of the MRSWMP area, and the Monterey Regional Waste Management District whose landfill serves most of the MRSWMP area, this Program Activity was successful at Levels 1, 2, and 3.

6. Our Water Our World "OWOW" Upkeep: The Our Water Our World (OWOW) program was developed with the intent of reducing pollution problems caused by two of the most commonly used residential pesticides: chlorpyrifos (Dursban) and diazinon. These two pesticides can kill organisms at the base of the aquatic food chain. The Public Education and Outreach Program Coordinator provided participating garden supply stores with bilingual fact sheets about managing common pests, along with an updated list of less toxic and non toxic pest control products recommended for sale. These products are identified in the stores through colorful OWOW shelf talkers. . The Public Education and Outreach Program Coordinator and performed upkeep and restocking of OWOW flyers and point-of-purchase (POP) tags in stores and ran print ads to garner awareness for the program.

This Program Activity was successful at Levels 1 and 2, and based on the reports from participating businesses on their increased sales of "green" gardening products, it was also successful at Level 3.

7. Our Water Our World "OWOW" Outreach Events: The Public Education and Outreach Program Coordinator participated in tabling events at selected garden stores in order to educate the public about non-toxic pest management products. In addition, free "Sluggo" samples, OWOW magnets, and educational materials were distributed. At each in-store event, the Coordinator was present for 2-3 hours to interact with the public and an estimated 37 people

were reached at these events.

This program has been extremely successful as far as public feedback and the support of the store staff and management. Members of the public that are approached are receptive and appreciative of the program. When people were informed of the safe pesticide alternatives which help protect wildlife, children, and water quality they were grateful for the information.

This Program Activity was successful at Levels 1 and 2, and based on the reports from participating businesses on their increased sales of "green" gardening products, it was also successful at Level 3.

8. Restaurant Training: Under this Program Activity educational materials and the bilingual Best Management Practices (BMP) restaurant video were distributed to restaurant staff and managers. The ultimate goal of the restaurant outreach program is to educate restaurant managers and their staff about proper BMP to prevent stormwater pollution and encourage the restaurant to become a certified Green Business.

The following is a summary of the training and educational activities that were conducted:

- 86 BMP posters and 111 BMP DVDs were distributed in three of the MRSWMP cities.
- A workshop to promote businesses becoming certified Green Businesses was held. Five restaurants participated

This Program Activity was successful at Levels 1 and 2, and based on the reports from some of the restaurants that participated in the workshop it was also successful at Level 3.

9. Bilingual Radio Ads: Radio ads were booked on numerous local radio stations selected in order to cost-effectively reach a large segment of the population with repeated messages about stormwater pollution prevention. An advertising demographics analysis indicated that 59.8% of the population with the MRSWMP area heard these educational messages 3 or more times. This Program Activity was successful at Levels 1 and 2.

10. Bilingual Bus Ads: These ads are another cost effective method for reaching the general public to educate them about storm water pollution prevention topics. Using an analytical technique developed by the local bus company, it is estimated that over the 12 month current reporting period, approximately 43,200,000 persons viewed these ads. This Program Activity was successful at Levels 1 and 2.

11. Bilingual Movie Ads: Movie theatre ads are another cost-effective media strategy to reach the public. Movie theatre preview ads were booked with the cinema advertising agency, and movie attendance was tracked through data provided by the cinema agent.

Based upon the theatre box office attendance for the fourteen-week time period over which these ads ran during the current reporting period, it is estimated that over 400,000 persons viewed the ads. This Program Activity was successful at Levels 1 and 2.

12. Publicity/Press Releases: Publicity in various forms was used to inform the public about stormwater pollution prevention and MRSWMP public participation events. The effectiveness

of this Program Activity was assessed by using the circulation numbers for each paper to estimate the total number of impressions for all 21 of the ads that were run. It is estimated that the ads were viewed by nearly 650,000 persons. This Program Activity was successful at Levels 1 and 2.

13. Website: The MRSWMP website has the domain name www.monterysea.org. It is hosted by Monterey County. The site includes educational materials, outreach programs, information and links on sea otter mortality, how an individual can take action, participate in meetings, workshops, annual reports and community participation events. There were 6,403 website hits on the website during the current reporting period. A number of the local entities and some radio stations also have a link to this website on their homepages. This Program Activity was successful at Levels 1 and 2.

14. Events: 11 events were held, with a combined duration of 18 days, in order to distribute educational materials and to interact with the public using the hands-on Enviroscape model. A total of 1,882 people were reached at these events, and 2,932 pieces of educational literature were distributed. In addition to educating the public, public participation in the form of volunteers from the community who donated their time to man the booths at the events was also achieved. This Program Activity was successful at Levels 1 and 2.

15. Public Attitude Survey: In an effort to garner more public feedback and determine the effectiveness of the education program, an "Attitude Survey" recommended by the EPA was distributed at events. This is a short survey with a few questions for residents and tourists to answer. Upon completion participants were rewarded with a poster, coloring book, or magnet. A total of 60 people (age range 6-61+) were surveyed from community events and schools in the cities of Monterey, Pacific Grove and Seaside. Most of the people surveyed resided in Monterey County and 4 resided in Santa Cruz County. Thirty-five of these people ranged in age from 6-34, and 25 of these people ranged in age from 35-61+. In addition one high school class totaling 16 students (ages 15-17) was surveyed in Monterey.

Detailed survey results are contained in Appendix A. Based on those results this Program Activity was successful at Levels 1 and 2.

16. Hands-On Storm Drain Display: The brochures were stocked, and the Enviroscape model was set up for public education at the Pacific Grove Natural History Museum in Pacific Grove. This portable hands-on storm drain model depicts oil spilling through a stenciled storm drain grate. The handle on the grate lifts up revealing an educational message about urban runoff. A brochure stand attached to the model distributes the bilingual *Monterey Bay Begins on Your Street* brochures. A total of 268 brochures were distributed. This Program Activity was successful at Levels 1 and 2.

17. Tourist Outreach: In addition to the radio, bus, movie, print ads and outreach events, tourists were targeted via hotels and visitor centers. A bilingual 30-second Public Service Announcement (PSA) depicts how pollution on land (from washing cars and changing motor oil) can lead straight to the sea. Hotels/motels were contacted to run the bilingual 30-second PSA on their closed cable station. However, getting the PSA into the hotel circuit has not been successful. Instead of pursing this unsuccessful route, a partnership with the Monterey Bay Aquarium, including contributing funds toward their summer bilingual theatrical performances,

was developed in order to reach tourists.

In addition 119 (82 English, 37 Spanish) copies of the bilingual *Monterey Bay Begins On Your Street* brochures were distributed to local visitor centers in Seaside, Sand City and Monterey.

Surveys of visitors (described in detail in Appendix A) confirmed that this outreach program is effectively reaching tourists and causing behavioral changes for the better.

This Program Activity was successful at Levels 1 and 2, and, based on the survey results, was also successful at Level 3.

18. Logo: The logo helps give visual recognition for the MRSWMP Participating and Coordinating Entities, referred to in the logo as the Stormwater Education Alliance (SEA). The SEA acronym is easier for the public to embrace. The logo promotes a unified educational program to gain recognition throughout the permit area. The logo is used extensively in media ads, printed materials, events, school outreach and publicity. These educational materials include the bilingual *Monterey Bay Begins On Your Street* brochures, bilingual "Be Kind To Animals" coloring book, bilingual storm drain poster, bilingual movie ads and bus ads, bilingual newspaper ads, bilingual display banner, teacher flyers and BMP brochures and posters.

This Program Activity was successful at Levels 1 and 2.

19. Printing of Educational Materials: The SEA program educator coordinated the regional print order of the educational materials. Other entities using the educational print materials on a regular basis are the Cities of Watsonville, Santa Cruz and the MBNMS. To cut down on printing costs, they participate when possible in the regional print order, thus saving money for all entities.

The total number of educational materials distributed via school outreach, public events, OWOW events, OWOW distribution, portable hands-on storm drain model display, and targeted businesses was 6,839. This does not include the city newsletters sent to residents.

This Program Activity was successful at Levels 1 and 2.

The table below summarizes the effectiveness of each of the Program Activities carried out under MCM No.1.

EFFECTIVENESS ASSESSMENT SUMMARY FOR MCM NO. 1
PUBLIC EDUCATION AND OUTREACH FOR THE CURRENT REPORTING PERIOD

Outreach Program Activities	Effectiveness Assessment Outcome Levels			
	Level 1	Level 2	Level 3	Level 4
	Implement Program	Increase Awareness	Behavior Change	Load Reductions
1. School Outreach K-12	X	X		
2. Sea Otter Mortality	X	X		
3. Selected BMP Brochures	X	X	X	
4. Residential Outreach	X	X		
5. HHW	X	X	X	
6. Our Water Our World (OWOW) displays.	X	X	X	
7. OWOW Outreach events.	X	X	X	
8. Restaurant Outreach/ Green Business Program	X	X	X	
9. Bilingual Radio Ads	X	X		
10. Bilingual Bus ads	X	X		
11. Bilingual Movie Ads	X	X		
12. Publicity & Press releases	X	X		
13. Website	X	X		
14. Events	X	X		
15. Public Attitude Survey	X	X		
16. Large hands-on storm drain model.	X	X		
17. Tourist Outreach	X	X	X	

Outreach Program Activities	Effectiveness Assessment Outcome Levels			
	Level 1	Level 2	Level 3	Level 4
	Implement Program	Increase Awareness	Behavior Change	Load Reductions
18. Logo Development	**X**	**X**		
19. Printing of educational materials.	**X**	**X**		

Note: At this early stage of implementation of the MRSWMP, it is not expected that any of the BMPs will be able to demonstrate success above Level 4. Therefore, the summary table above only goes up to Level 4. In future Annual Reports, if any of the BMPs demonstrate success above Level 4, the table will be expanded to include higher levels.

MCM 2.0 Public Involvement and Participation

The Public Participation and Involvement Minimum Control Measure is intended to foster active community support for the Storm Water Management Program and to give direction to its implementation. Participation by the public ensures that the program reflects community values and priorities and thus has the highest potential for success.

The BMPs established under this MCM for the current reporting period are listed and described below in order to assess their effectiveness. More detail and discussion on some of these BMPs is contained in Appendix B, and for brevity is not repeated here.

BMP 2-1.a: **Draft annual report will be posted on the website and in city offices for review by public one month prior to Annual Workshop No. 2.** The Draft Annual Report was printed in sufficient quantities to place a copy in each of the local libraries, and then a print ad in the local media was placed notifying the public that the report was available for their review at those locations. It was also available for review at the offices of each of the cities. A public workshop to discuss the Annual Report was held, and the Workshop was subsequently televised numerous times on Public Access Television. This BMP was successful at Levels 1 and 2.

BMP 2-1.c: Hold Annual Workshop #2 annually in early November prior to Annual Report submission to explain the Phase II Permit objectives and solicit public input on the success of the current BMPs and Measurable Goals. The Workshop held for the Year 1 Annual Report in November, 2007 was very lightly attended in spite of significant advertising to encourage public participation. This was reported on in the Year 1 Annual Report.

To see if public participation in the Workshop could be improved by altering the time-of-day and the forum, the Public Workshop to present and discuss the Year 2 Annual Report was held on November 3, 2008 during the noon hour, again at the Monterey City Council Chambers which is readily accessible to public transportation and is located in the heart of Monterey. Light food and beverages were provided for the public attending the Workshop.

This Workshop was recorded on a video camera, and was then posted on the SEA Website as a pod cast, so members of the public who could not attend the Workshop in person could view it in its entirety on their home computers. To allow these members of the public to provide their input, an email address was provided to which they could send their comments and suggestions.

The local cable television channel called Access Monterey Peninsula (AMP) taped the workshop, referred to on AMP as the "Monterey Regional Storm Water Management Program Meeting," and will air it numerous times beginning shortly after the November 3 date of the Workshop. The meeting was also made available for downloading from www.ampmedia.org.

As was done for the Annual Report Workshop in Year 1, public advertising was done to encourage the public to attend this Workshop. As a result of making these changes more members of the public attended or viewed the November, 2008 Workshop for the Year 2 Annual Report.

This BMP was successful at Levels 1 and 2.

BMP 2-1.d: Hold Annual Workshop #1 annually in Mar-April - Workshop #1 in Years 2-5 will focus on a specific target audience and associated contaminants of concern. Topic/audience will be chosen each year based on historical contaminants of concern for industries common to permit jurisdiction area, volunteer monitoring network data, and topic/audience not chosen the prior year. Priority will be given to the Inventory of Businesses to be Inspected contained on pages E-37 through E-65 of Appendix E.
Workshop No. 1 was focused on Commercial Washers. An invitation to attend the Workshop was mailed directly to over 800 businesses that were considered to potentially be Commercial Washers, and public notices were placed in local newspapers.

Fifteen individuals who own, or work in, businesses in one or more of the Commercial Washer categories attended the Workshop. Informational materials were distributed, and a PowerPoint presentation was made providing an overview of the storm water regulations, how these affect Commercial Washers, and the Proposed Approach to Managing these Discharges.

The presentation and the materials seemed to be well received by the audience. Although the goal of having 40 participants was not achieved, the Workshop did accomplish its purpose of educating those Commercial Washers who wished to have a more complete understanding of the storm water pollution prevention requirements affecting their businesses. Several of those attending the Workshop indicated they had already changed their procedures to comply with these requirements, or were planning to do so in the near future.

This BMP was successful at Levels 1, 2, and 3.

BMP 2-2.a: Provide financial sponsorship support for Annual Coastal Cleanup Day in Monterey County or other local beach clean up efforts. A check in the amount of $500 was sent to the California State Department of Parks and Recreation, the sponsor of this event, on May 24, 2008. Although we do not know exactly how the State used this money, they did give us a big "thanks" for the contribution, so it is assumed it was used to help with their expenses to conduct the event. This BMP was successful at Levels 1 and 2, and it helped the event itself be successful at Levels 3 and 4.

BMP 2-2.b Recruit volunteers through municipal employee base and through advertising for Annual Coastal Clean Up Day or other local clean up efforts.
Each of the co-permittees recruited volunteers using various approaches such as internal emails, paycheck stuffers, and bulletin board announcements. This BMP was successful at Levels 1 and 2.

BMP 2-2.c Provide support for, or assistance with, storm drain stenciling through providing supplies, volunteer recruitment, and staff labor. Under the stenciling program that is conducted through the resources and financial support of the MRSWMP co-permittees, 380 inlets were stenciled throughout the area covered by the MRSWMP during the current reporting period. This allowed the stenciling volunteers to gain a hands-on understanding of the storm drainage system and how they can help prevent storm water pollution. This BMP was successful at Levels 1, 2, and 3.

BMP 2-2.d Provide financial support for, or assistance with, volunteer monitoring programs and public participation events such as: Urban Watch, First Flush, Snapshot Day, and Walk N' Talk Days. Funding totaling over $55,000 in either direct contributions or in the form of advertising was provided by the MRSWMP Group to numerous storm water pollution prevention programs, as detailed under this MCM. This BMP was successful at Levels 1 and 2.

BMP 2-2.d Prioritize Pollutants of Concern (see subheading titled "Conclusions" on page 4-13) from Urban Watch and First Flush data; conduct source tracking using upstream monitoring for highest priority pollutants and use this to identify probable sources; inspect these sources under Minimum Control Measure No. 3 and take appropriate corrective actions in accordance with BMPs 3-3.d and 3-4.a. The Steinbeck Plaza outfall in Monterey was selected for source tracking because of the high levels of orthophosphate and E. Coliform that have been found in its discharge during the Urban Watch and/or First Flush monitoring programs in recent years. To date the source of these high levels has not been determined, but several suspected sources have been investigated and ruled out. It is expected that the source will be identified sometime during Year 3, and that action to correct this will then be taken and reported on in the Year 3 Annual Report. Based on the assumption that this work will ultimately find, and eliminate, these pollutant discharge sources, this BMP was considered to be successful at Level 4.

BMP 2-2.d Within the MRSWMP area the First Flush and Urban Watch monitoring programs will be expanded to include the following: Outfalls which receive drainage from commercial, industrial, or residential areas which meet the following criteria: (1) Are over 18" in diameter, and (2) Are safe for volunteers/staff to access, including those that discharge to a 303(d) listed water body. Conduct monitoring on these additional outfalls for a similar set of constituents as are monitored under the Urban Watch and First Flush Programs. Monterey County will focus on 303(d) listed water bodies in Year 2, and will expand into the other water bodies over the remaining permit term. The expanded outfall monitoring program that was carried out through the MRSWMP Group is described in detail under this MCM and in Appendices B and P. The BMP was completely fulfilled. This BMP was successful at Levels 1 and 2.

BMP 2-2.d Based on existing scientific studies and data, the MRSWMP Group will implement a pollution reduction component that identifies with specificity the geographic areas within the jurisdiction of each municipality that are sources of pollution, including *T. Gondii* and other pathogens, impacting California sea otters.
Once the geographic areas are identified the MRSWMP group will create and implement a program to reduce and eliminate the sources of pollution identified as impacting sea otters.
A program to address the concern regarding *T. Gondii* infections in sea otters, and the potential that such infections were due in part to urban storm water runoff, was developed and reported on in Year 1. However, as noted in the letter received from The Otter Project's Executive Director contained in Appendix O, the scientific community is now of the opinion that the impact of storm water discharges on Sea Otter health and mortality is not nearly as significant as previously thought. Consequently, other than having the Public Education and Outreach Program advise residents to avoid disposing of pet waste to the storm drainage system, no further action on this

BMP is contemplated. To the extent that the Public Education and Outreach Program informs residents of the potential adverse impacts to the environment of pet waste disposal, this BMP was successful at Levels 1 and 2.

BMP 2-3.a A representative from the MRSWMP group will become an active participant in the Citizen Water Quality Monitoring Network. The MRSWMP Group was represented at all of the Network meetings held during the current reporting period. Since the Network representatives that conduct these meetings are also regular attendees at the MRSWMP Group meetings, it is not essential that a Group member (co-permittee) attend the meetings to maintain a close working relationship between the Network and the Group. However, the Group intends to continue sending a representative to each of the Network meetings whenever possible. This BMP was successful at Levels 1 and 2.

The table below summarizes the effectiveness of each of the BMPs carried out under MCM No. 2.

EFFECTIVENESS ASSESSMENT SUMMARY FOR MCM NO. 2
PUBLIC INVOLVEMENT AND PARTICIPATION
FOR THE CURRENT REPORTING PERIOD

BMP	Effectiveness Assessment Outcome Levels			
	Level 1	Level 2	Level 3	Level 4
	Implement Program	Increase Awareness	Behavior Change	Load Reductions
2-1.a Annual Report	X	X		
2-1.c Annual Workshop (for Annual Report)	X	X		
2-1.d Annual Workshop (for focused target group)	X	X	X	
2-2.a Financial Sponsorship	X	X	X	X
2-2.b Recruit Volunteers	X	X		
2-2.c Storm Drain Stenciling	X	X	X	
2-2.d Financial Support and/or Assistance with Volunteer Programs	X	X		
2-2.d Source Tracking				X
2-2.d Expanded Outfall Monitoring Program	X	X		
2-2.d Sea Otter Impacts	X	X		
2-3.a Attend Citizen Water Quality Monitoring Network Meetings	X	X		

Note: At this early stage of implementation of the MRSWMP, it is not expected that any of the BMPs will be able to demonstrate success above Level 4. Therefore, the summary table above only goes up to Level 4. In future Annual Reports, if any of the BMPs demonstrate success above Level 4, the table will be expanded to include higher levels.

MCM 3.0 Illicit Discharge Detection & Elimination

The Illicit Discharge Detection and Elimination (IDDE) Minimum Control Measure is locate the sources of illegal discharges and illicit connections to the storm drainage system, and to take actions to eliminate these sources of pollution.

The co-permittees have effectively implemented the IDDE MCM through ongoing program elements which include complaint and discovery response and follow-up, development of storm drain outfall maps, performing business inspections, implementing a storm water ordinance, developing and distributing targeted educational materials to polluters or potential polluters, and conducting a public workshop for a targeted group of commercial washers (as reported under MCM No. 2).

The BMPs established under this MCM for the current reporting period are listed and described below in order to assess their effectiveness. More detail and discussion on these BMPs is contained in Section 3 - Illicit Discharge Detection and Elimination, and for brevity is not repeated here.

BMP 3-1.b Advertise 1-800-CLEANUP call-in number on MRSWMP generated-media and educational materials. As reported under MCM No. 1, publicity in various forms was used to inform the public about stormwater pollution prevention and to inform them that illegal discharges and other forms or storm water pollution could be reported to the proper authorities by calling this Hotline. This BMP was successful at Levels 1 and 2.

BMP 3-1.c Using the protocol contained on pages E-30 through E-33 of Appendix E of the MRSWMP, investigate and take appropriate action on each report of illicit discharge that is received. Numerous reports of illegal discharges or other types of storm water pollution activities were received by the individual co-permittees, as reported in their individual Appendices. In each instance an appropriate action was taken to correct the problem and to avoid a recurrence of the problem. The incident reporting and response program is very effective in that the response time is normally rapid, and the issues are thus addressed quickly. Due to timely responses illegal discharges are effectively dealt with. Staff has face to face communication when possible with the responsible parties and in many instances targeted educational materials related to the discharge in question are provided. When appropriate, follow up inspections and/or meetings are held to ensure abatement has been completed. This BMP was successful at Levels 1, 2, and 3. Where follow-up resulted in elimination of discharge the BMP was also successful at Level 4.

BMPs 3-2.a & 3-2.b Complete preparation of the storm drain system map contained on pages E-34 through E-36 of Appendix E of the MRSWMP, showing the location of all outfalls discharging to waters of the state and other MS4s that receive discharges from those outfalls. Storm drain outfall maps are useful if monitoring, such as that conducted routinely by the County of Monterey's Health Department, finds that elevated levels of pollutants are occurring in receiving waters. During the current reporting period, none of the co-permittee's outfalls were found to be the cause of receiving water quality violations. This BMP was successful at Level 1.

<u>BMP 3-3.b</u> Using the inventory of businesses to be inspected and the inspection checklists contained on pages E-37 through E-77 of Appendix E of the MRSWMP, prioritize the businesses to be inspected, and perform compliance inspections on these businesses to identify illicit connections and illegal discharges. Discharges to Environmentally Sensitive Areas, discharges to Areas of Special Biological Significance, restaurants/fast food chains, auto repair shops, and gas stations will receive top prioritization in scheduling these inspections. The business inspection program is very effective in several ways. First it enables inspectors to get direct attention from potentially polluting businesses. Inspectors speak with owners and managers directly about possible illicit discharges and inform them that there can be serious consequences if discharges are not abated in a reasonable amount of time. This program allows each of the co-permittees to take a close look at businesses to identify any possible illicit discharges they may need to be addressed. Inspectors provide and discuss targeted educational materials such as BMP brochures, training videos or DVDs, and workplace posters. It also gives staff the opportunity to spot other illicit discharges from neighboring businesses that may not be a targeted business or illicit discharges elsewhere in the community.

As reported in the individual co-permittee Appendices, more than 130 separate businesses were inspected during the current reporting period. Very few of these were found to be performing illegal discharges, or had illicit connections. Where there were violations or other types of problems, they were noted on the inspection forms and corrective actions were taken by the business owners. Only in a very small number of instances was any enforcement action required to bring about these corrections. This BMP was successful at Levels 1, 2, and 3.

<u>BMP 3-3.d</u> Using the protocol contained on pages E-78 through E-79 and E-95 through E-98 of in Appendix E of the MRSWMP, take action as necessary to eliminate 100% of the illicit connections and illegal discharges that are identified in this year. As noted above, very few actions beyond issuance of either a verbal or written warning or notice of violation were required to bring about corrective action during the current reporting period. This indicates that the Public Education and Outreach Program conducted under MCM No. 1 is reaching a large number of the businesses within each of the co-permittee jurisdictions, and that this is helping to promote an environment in which business owners are aware of, and concerned about protecting, the environment – specifically the receiving waters to which the local storm drainage systems discharge. This BMP was successful at Levels 1, 2, and 3.

<u>BMP 3-3.e</u> Perform source tracking of manholes in the Hot Spot areas listed on page E-199 of Appendix E to determine source of pollutants. Source tracking was performed by each co-permittee. In no case did the source tracking inspections reveal the presence of any illegal discharges or illicit connections. This indicates that the Public Education and Outreach Program conducted under MCM No. 1, and the business inspections conducted under BMP 3-3.b, are effectively informing the businesses within each of the co-permittee jurisdictions about storm water pollution prevention issues. This BMP was successful at Levels 1, 2, and 3.

<u>BMPs 3-4.a and 3-4.c</u> Using the guidance document and model ordinance contained on pages E-80 through E-98 of Appendix E of the MRSWMP, each Participating Entity will adopt and implement a storm water ordinance revised to be specific to each entity's needs through appropriate governing body procedures. The ordinance has been effective by assuring co-permittee staffs the authority to conduct business inspections to identify the possible

existence of illegal discharges or illicit connections, and for taking actions to halt illegal discharges that are occurring from other activities occurring within their jurisdictions. Although not all of the co-permittees had adopted and implemented their ordinances as of the end of Year 2, most of them had. Within those entities who had adopted and implemented their ordinances, this BMP was successful at Levels 1, 2, and 3.

BMP 3-4.b Train appropriate staff on the adopted ordinance. Training was provided to co-permittee staff members who have responsibilities to implement and enforce the storm water ordinance. This enhanced their abilities to reduce storm water pollution by (1) being knowledgeable of the requirements of the ordinance, (2) being able to detect and identify improper storm water discharges and practices, and (3) using the provisions of the ordinance to reduce or eliminate such discharges. This BMP was successful at Levels 1, 2, and 3.

BMP 3-5.a Using the inventory of RV parks and boat marinas and the inspection lists contained on pages E-119 through E-124 of Appendix E, inspect each RV park and boat marina annually, and take action to correct any observed violations of the discharge ordinance. The small number of these types of businesses were all inspected. For the most part these businesses were found to be in compliance with applicable storm water pollution prevention requirements and good housekeeping practices. The few problems that were identified were corrected voluntarily. This BMP was successful at Levels 1, 2, and 3.

BMP 3-6.a Implement a permit boundary-wide education program addressing the negative effects on water quality through illegal discharges, improper waste disposal and other non-storm water discharges. The effectiveness of this BMP was assessed under the Public Education and Outreach Program under MCM No. 1. This BMP was successful at Levels 1 and 2.

The table below summarizes the effectiveness of each of the BMPs carried out under MCM No. 3.

EFFECTIVENESS ASSESSMENT SUMMARY FOR MCM NO. 3
ILLICIT DISCHARGE DETECTION AND ELIMINATION
FOR THE CURRENT REPORTING PERIOD

BMP	Effectiveness Assessment Outcome Levels			
	Level 1	Level 2	Level 3	Level 4
	Implement Program	Increase Awareness	Behavior Change	Load Reductions
3-1.b Advertise Hotline	X	X		
3-1.c Investigate Reports	X	X	X	X
3.-2.a & 3-2.b Mapping	X			
3-3.b Business Inspections	X	X	X	
3-3.d Action to Eliminate Illegal Discharges/Connections	X	X	X	
3-3.e Source Tracking	X	X	X	
3-4.a & 3-4.c Adopt & Implement Ordinance	X	X	X	
3-4.b Training on Ordinance	X	X		
3-5.a RV Parks & Boat Marinas	X	X	X	
3-6.a Education Program	X	X		

Note: At this early stage of implementation of the MRSWMP, it is not expected that any of the BMPs will be able to demonstrate success above Level 4. Therefore, the summary table above only goes up to Level 4. In future Annual Reports, if any of the BMPs demonstrate success above Level 4, the table will be expanded to include higher levels.

MCM 4.0 Construction Site Storm Water Runoff Control

The Construction Site Storm Water Runoff Minimum Control Measure is intended to minimize storm water pollution from construction sites to the maximum practical extent. The BMPs under this MCM include measures that contractors are required to implement on their construction sites to prevent storm water pollution from occurring due to runoff from their sites. The BMPs also include site-inspection and followup actions on the part of the co-permittees to ensure that these measures are being effectively implemented.

BMP 4-1.a Using the guidance document and model ordinance contained on pages E-84 through E-98 and E-125 through E-131 of Appendix E of the MRSWMP, each Participating Entity will adopt a storm water ordinance revised to be specific to each entity's needs through appropriate governing body procedures. [Note: This is not a BMP for Year 2, but some entities had not completed implementing their ordinances in Year 1, so this BMP is again being reported on in Year 2]. The ordinance has been effective by assuring co-permittee staffs the authority to require pollution prevention measures on construction sites, and to perform inspections of those sites to identify potential pollution problems and to take actions as necessary to eliminate them. The required on-site measures are largely described in the BMP Guidance Series for Construction, contained in Appendix E of the MRSWMP. Although not all of the co-permittees had adopted and implemented their ordinances as of the end of Year 2, most of them had. Within those entities who had adopted and implemented their ordinances, this BMP was successful at Levels 1, 2, and 3.

BMP 4-2.a Train appropriate staff on the site plan and construction inspection procedures contained on pages E-125 through E-131 of Appendix E procedures. Training for construction inspections, building inspectors and public works personnel who are involved in either site plan review or construction site inspections was provided toward the end of Year 1 (just prior to the date when the BMP Guidance Series for Construction requirements became effective) and again as refresher training in Year 2. During Year 2 approximately 26 staff members attended the training session. There was extensive interaction between the training program presenter and the members of the audience, indicating that concepts and requirements were being clearly presented and understood. Comments from participants both during and after the training session indicated their intent to change their expectations of contractors when reviewing site plans and conducting site inspections, to address the requirements contained in the BMP Guidance Series for Construction. This BMP was successful at Levels 1, 2, and 3.

BMP 4-2.b Use the site plan review procedures contained on pages E-100 through E-103 and E-125 through E-131 of Appendix E when reviewing construction projects. Construction site plans were reviewed for compliance, but not necessarily using the exact procedures described in Appendix E of the MRSWMP, because most of the permittees had different review procedures already in place. As reported in the individual entity appendices, during the current reporting period approximately 248 site plans were reviewed. This BMP was successful at Levels 1, 2, and 3.

During Year 3 it is planned to meet with members of the co-permittee staffs who are directly involved in construction site plan reviews to see if the review procedures can be adapted to better match the commitments contained in this BMP.

<u>BMP 4-3.a</u> Train appropriate staff on the construction site inspection procedures. Topics to be covered in this training will be the applicable portions of the materials contained on pages E-125 through E-136 of Appendix E, consisting of:

1. The Guidance Document for Policies and Procedures Pertaining to Construction Sites
2. Construction Site Plan Review and Inspection Procedures
3. Inspection Checklist for Construction Sites

As discussed above under BMP 4-2.a, during Year 2 approximately 26 staff members attended the training session. There was extensive interaction between the training program presenter and the members of the audience, indicating that concepts and requirements were being clearly presented and understood. Comments from participants both during and after the training session indicated their intent to change their expectations of contractors when reviewing site plans and conducting site inspections, to address the requirements contained in the BMP Guidance Series for Construction. This BMP was successful at Levels 1, 2, and 3.

<u>BMP 4-3.b</u> Using the procedures and checklists contained on pages E-127 through E-136 of Appendix E, inspect the construction sites subject to the storm water ordinance and take appropriate action to have any observed violations corrected. Construction sites were inspected for compliance, but not necessarily using the exact procedures described in Appendix E of the MRSWMP, because most of the permittees had different inspection procedures already in place. As reported in the individual entity appendices, during the current reporting period approximately 1,802 construction site inspections were performed by the co-permittees. Of the sites that were inspected, only 28 of them were found to have violations. This is an indication that contractors are becoming familiar with, and are implementing, the storm water pollution prevention practices and procedures described in the BMP Guidance Series for Construction. All of the violations were promptly corrected voluntarily, and none of them required further enforcement actions. This BMP was successful at Levels 1, 2, and 3.

During Year 3 it is planned to meet with members of the co-permittee staffs who are directly involved in construction site inspections to see if inspection procedures can be adapted to better match the commitments contained in this BMP.

<u>BMP 4-4.a</u> Use the procedures contained on pages E-30 through E-33 of Appendix E of the MRSWMP to facilitate the receipt of, and the response to, reports from the public of storm water pollution from construction sites. As reported in the individual entity appendices, during the current reporting period only approximately 7 reports of storm water pollution occurring from construction sites were received. In each instance an appropriate action was taken to correct the problem and to avoid a recurrence of the problem. The actions were taken voluntarily on the part of the contractor, and none of the incidents required further enforcement action. The incident reporting and response program is very effective in that the response time is normally rapid, and the issues are thus addressed quickly. Due to timely responses pollution problems from construction sites are effectively dealt with. Staff has face to face communication with the contractors which provides the opportunity to review construction site pollution prevention requirements and practices. In some instances Construction BMP brochures were provided to the contractors. When appropriate, follow up inspections and/or meetings were held to ensure abatement has been completed. This BMP was successful at Levels 1, 2, and 3. Where follow-up resulted in elimination of discharge the BMP was also successful at Level 4.

<u>BMP 4-4.b</u> Twice per year at construction contractor professional meetings, present an educational program regarding prevention of storm water pollution from construction sites. The program will cover the four guiding principles for controlling runoff from construction sites, which are included in the BMP Guidance Series:

- **Construction site planning**
- **Minimization of soil movement**
- **Capturing of Sediment**
- **Good housekeeping practices**

At these presentations handouts describing construction site permitting procedures and construction site BMPs will also be distributed.

During the current reporting period it was not possible to find more than one organization that was willing to have an educational presentation made. This is because there are very few contractor organizations in the MRSWMP area, and the contractors that attended the presentations made in Year 1 were mostly the same people that belong to the other organizations. The organizations to which the Year 1 presentations were made did not feel there was sufficient interest in having a repeat presentation made during Year 2, and the other organizations, with one exception, felt that their members had already attended the Year 1 presentation by virtue of being members of those other organizations. In Year 2 the presentation was made to the National Association of the Remodeling Industry (NARI). Approximately 15 persons attended the presentation, representing approximately 10 different firms. This BMP was not as successful as hoped, but it did reach some additional members of the construction contracting community that had not attended previous educational programs, so it did have limited success at Levels 1 and 2. It is likely that this BMP will be proposed for elimination in Years 3 and beyond, as it appears to have achieved as much success as it can.

The table below summarizes the effectiveness of each of the BMPs carried out under MCM No. 4.

EFFECTIVENESS ASSESSMENT SUMMARY FOR MCM NO. 4
CONSTRUCTION SITE STORM WATER RUNOFF CONTROL
FOR THE CURRENT REPORTING PERIOD

BMP	Effectiveness Assessment Outcome Levels			
	Level 1	Level 2	Level 3	Level 4
	Implement Program	Increase Awareness	Behavior Change	Load Reductions
4-1.a Adopt & Implement Ordinance	X	X	X	
4-2.a & 4-3.a Training	X	X	X	
4-2.b Site Plan Reviews	X	X	X	
4-3.b Site Inspections	X	X	X	
4-4.a Investigate Reports	X	X	X	X
4-4.b Educational Presentations	X	X		

Note: At this early stage of implementation of the MRSWMP, it is not expected that any of the BMPs will be able to demonstrate success above Level 4. Therefore, the summary table above only goes up to Level 4. In future Annual Reports, if any of the BMPs demonstrate success above Level 4, the table will be expanded to include higher levels.

MCM 5.0 Post-Construction Storm Water Management in New and Redevelopment

The Post-Construction Storm Water Management in New Development and Redevelopment Minimum Control Measure is intended to minimize storm water pollution from new construction projects to the maximum practical extent. The BMPs under this MCM include design approaches, design features, and in some cases structural facilities that designers of such projects are required to incorporate into their projects to prevent storm water pollution from occurring due to runoff from these projects. The BMPs also include followup actions to ensure that these measures are being effectively operated and maintained by the project owners.

Under the MRSWMP, these requirements do not go into effect until Year 3. Only three BMPs under this MCM were scheduled to be carried out during the current reporting period, and these are discussed below. The other BMPs will begin implementation in Year 3 and beyond.

BMP 5-1.a Using the guidance document and model ordinance contained on pages E-84 through E-98 and E-137 through E-143 of Appendix E of the MRSWMP, each Participating Entity will adopt a storm water ordinance revised to be specific to each entity's needs through appropriate governing body procedures. [Note: This is not a BMP for Year 2, but some entities had not completed implementing their ordinances in Year 1, so this BMP is again being reported on in Year 2]. The ordinance has been effective by assuring co-permittee staffs the authority to require the incorporation of pollution prevention measures into the design of New Development and Redevelopment Projects, and to ensure that the measures designed into these projects are properly operated and maintained. The required measures are largely described in the BMP Guidance Series for New Development and Redevelopment, contained in Appendix E of the MRSWMP. Although not all of the co-permittees had adopted and implemented their ordinances as of the end of Year 2, most of them had.

The provisions of the ordinance which pertain to New Development and Redevelopment Projects do not become effective until Year 3, so the effectiveness of this BMP cannot yet be assessed.

BMP 5-2.a Train appropriate staff on the plan review procedures contained on pages E-139 through E-143 of Appendix E. With the exception of the City of Sand City, all co-permittees had staff attend the training session for this BMP. These staff members were from Building Departments and were those involved in performing plan reviews and/or building inspections. Also attending were some public works personnel who are involved in either site plan review or construction site inspections. During Year 2 approximately 30 staff members attended the training session. There was extensive interaction between the training program presenter and the members of the audience, indicating that concepts and requirements were being understood. Comments from participants both during and after the training session indicated their intent to change their expectations when reviewing project designs, to address the requirements contained in the BMP Guidance Series for New Development and Redevelopment. This BMP was successful at Levels 1, 2, and 3.

BMP 5-4.a Present an educational program to design professionals regarding prevention of storm water pollution from New Development and Redevelopment Projects. The program will cover the principles for managing runoff from such projects, as described in the BMP Guidance Series for New Development and Redevelopment. [Note: This BMP was not

originally contained in the MRSWMP, but was voluntarily added by the co-permittees as a desirable addition to this MCM].
During Year 2 an educational program was presented to the local Chapter meeting of the California Society of Professional Engineers. This group was selected for the presentation, because it was learned that most local project designers and/or architects will look to engineers, such as those who attended this meeting, to design the site improvements which would include many of the storm water BMPs. 28 persons, representing 8 separate firms or entities, attended this presentation. During the presentation there was extensive interaction between the presenter and the members of the audience, indicating that concepts and requirements were being understood. Comments from participants both during and after the training session indicated their intent to change their expectations when preparing project designs, to address the requirements contained in the BMP Guidance Series for New Development and Redevelopment. This BMP was successful at Levels 1, 2, and 3.

An effort was made to make a similar presentation to the local Chapter of the American Institute of Architects (AIA) but in spite of numerous offers to make the presentation, no acceptance from the AIA Chapter to make the presentation was ever received.

The table below summarizes the effectiveness of each of the BMPs carried out under MCM No. 5.

EFFECTIVENESS ASSESSMENT SUMMARY FOR MCM NO. 5
POST-CONSTRUCTION STORM WATER MANAGEMENT
IN NEW DEVELOPMENTAND REDEVELOPMENT
FOR THE CURRENT REPORTING PERIOD

BMP	Effectiveness Assessment Outcome Levels			
	Level 1	Level 2	Level 3	Level 4
	Implement Program	Increase Awareness	Behavior Change	Load Reductions
5-1.a Adopt & Implement Ordinance	N/A(1)			
5-2.a Training	X	X	X	
5-4.a Educational Program for Design Professionals	X	X	X	

Note: At this early stage of implementation of the MRSWMP, it is not expected that any of the BMPs will be able to demonstrate success above Level 4. Therefore, the summary table above only goes up to Level 4. In future Annual Reports, if any of the BMPs demonstrate success above Level 4, the table will be expanded to include higher levels.
Footnotes: (1) Provisions of the ordinance pertaining to New Development and Redevelopment Projects do not become effective until Year 3, so this BMP can not yet be assessed.

MCM 6.0 Pollution Prevention / Good Housekeeping Practices for Municipal Operations

The Pollution Prevention/Good Housekeeping Practices for Municipal Operations Minimum Control Measure is intended to minimize to the maximum practical extent storm water pollution from in-house programs, projects, and activities that are carried out by the co-permittees themselves.

In addition to training BMPs, the BMPs under this MCM include specific pollution prevention activities pertaining to:

- Vehicle maintenance and vehicle washing activities
- Landscape maintenance
- Storage and handling of hazardous materials
- Handling and disposal of motor oil and filters
- Proper disposal of water drained from municipal swimming pools
- Street sweeping
- Storm drainage system operation and maintenance
- Bridge and street maintenance projects
- Good housekeeping of parks and trash enclosures

BMP 6-1.a Using the training outline and materials contained on pages F-22 through F-34 of Appendix F of the MRSWMP, train appropriate municipal employees (including supervisors) on storm water pollution issues. General training of municipal employees on storm water pollution prevention topics was conducted as a Group activity in Year 1. This training of municipal employees increases their knowledge and awareness which in turn improves the performance of their municipal responsibilities and increases the reporting of illicit discharges.

Refresher training and training for new employees is conducted individually by each co-permittee on an as-needed basis. The individual co-permittees have available to them a training DVD or VHS video, instructions on how to conduct the training, and a quiz that can be given before and after the training to determine how successful the training was in terms of increased knowledge of storm water pollution prevention topics. During the current reporting period, only a few entities needed to provide training to new employees, as most of the entities did not have new hires during the year in positions for which training would be appropriate. Several entities reported an increased awareness and reporting of storm water pollution events from their staff members as a result of this training.

This BMP was successful at Levels 1, 2, and 3.

BMP 6-2.a Promptly correct any hazardous materials inspection deficiencies reported by the County inspectors, who are responsible for all of the hazardous materials inspections in Monterey County. (The inspection forms used by the County are contained on pages E-146 through E-168 of Appendix E of the MRSWMP and indicate the thoroughness that the County's inspections entail.) All but one of the co-permittees (City of Sand City) is inspected annually by the County for compliance with applicable hazardous materials handling and storage regulations. Sand City does not store or use such materials in sufficient quantities to warrant inspection. The inspections generally found very minor, if any, violations. Violations tended to

be minor lapses in record-keeping and signage, and did not indicate a recurrence of previous violations for the same items. The violations were promptly corrected, bringing the facilities into full compliance. The small number and minor nature of the violations indicates that training is raising awareness of these issues. This BMP was successful at Levels 1, 2, and 3.

BMP 6-3.a Train appropriate staff on the procedures contained on pages E-169 through E-174 of Appendix E for proper disposal of used motor oil and filters. The City of Monterey reported that the personnel they hire to perform vehicle maintenance are already knowledgeable about proper disposal of used motor oil and filters, and thus additional training on this topic is not necessary. Several of the entities contract with the City of Monterey to perform all of their vehicle maintenance, including oil and filter changing. The City of Seaside provides annual hazardous materials training for its staff, one component of which deals with proper disposal of used motor oil and filters. Thus, whether the training is specifically provided, or whether the managers of the vehicle maintenance activities in each entity oversee the proper disposal of these materials, the end objectives of this BMP are being fully accomplished. This BMP was successful at Levels 1, 2, and 3.

BMP 6-3.b Use procedures contained on pages E-169 through E-174 of Appendix E for disposal of used motor oil and filters. The comments under BMP 6-3.a are applicable to this BMP as well. This BMP was successful at Levels 1, 2, and 3.

BMP 6-4.a Train municipal staffs to use the procedures contained on pages E-175 through E-176 of Appendix E of the MRSWMP to properly manage landscape and lawn care activities. Offer training to other agencies such as school districts beginning in Year 3. Group training for this BMP was provided during Year 1, as reported in the Year 1 Annual Report. During the current reporting period a refresher training session was provided for this BMP. Local school districts were invited to attend this training, and representatives from the Carmel Unified School District did attend. The refresher training covered the integrated pest management (IPM), landscape management, and irrigation topics required under this BMP. Regular reporting on pesticide use has resulted in increased awareness and behavior changes in entity staff by implementing pest management efforts which minimize, and in some cases eliminate the use of pesticides where feasible. Due to the relatively small turnover of personnel in the departments of the entities in which this type of work is performed, it is probably not necessary to provide repeat training each year. As the personnel that work in these departments often bring prior work experience and/or training to their positions when they are hired, or undergo on-the-job training from other department members who are familiar with these topics, it is difficult to determine whether the training has achieved any change in behavior (Level 3). However, this BMP was clearly successful at Levels 1 and 2.

BMP 6-4.b Perform spraying during times where rain is not predicted. All of the entities have formalized this requirement into their standard-operating-procedures, and some of them have even annotated their "Monthly Summary Pesticide Use Reports," which they are required to submit to the Monterey County Health Department, to reflect this. Most of the entities reported that they already had this practice in place before the MRSWMP was implemented, but this BMP is still considered to be a valuable one in reducing storm water pollution from landscape management. This BMP was successful at Levels 1 and 2, and perhaps in some entities, also at Level 3.

BMP 6-5.a Use the procedures contained on pages E-177 through E-179 of in Appendix E of the MRSWMP for the proper disposal of swimming pool water. None of the entities have swimming pools that discharge to the storm drainage system, so there has been no need to implement the dechlorination procedures described on these pages of the MRSWMP. Of the few entities that have swimming pools, all of them either already discharge through hard-piping to the sanitary sewer, or will use portable dewatering equipment that will pump to the sanitary sewer when they need to perform pool maintenance. Thus, the end objectives of this BMP are being completely fulfilled. This BMP was successful at Levels 1 and 2.

BMP 6-6.a Conduct sweeping on a regular basis in accordance with the programs and plans contained on pages E-180 through E-196 of Appendix E of the MRSWMP. All of the entities perform regular street sweeping as described in their individual sweeping programs contained on these pages of the MRSWMP. Although no specific local studies have been performed to confirm this, published literature reports that street sweeping is an effective means of reducing storm water pollution from runoff from city streets and parking lots. Therefore, it can be shown that this BMP was successful at Level 1, and can be assumed to have been successful at Level 4.

BMP 6-6.b Twice during the 5-year permit period, perform an analysis for pollutants of concern in material removed from streets by sweeping. This was the first year for performance of this BMP. The required analyses were performed during the current reporting period. The sampling locations for these analyses were picked based on the findings of the First Flush monitoring program that has been conducted for several years, and continues being conducted. That program identified the drainage areas within the MRSWMP permit boundary that had the highest levels of constituents that might typically be removed by street sweeping, which in this instance were determined to be metals. Four samples were collected within each of the three drainage areas which had the highest recurring levels of these constituents. These were located in the cities of Monterey, Pacific Grove, and Carmel-by-the-Sea.

The results of this sampling program served to identify the streets within those drainage areas that appeared to have the highest levels of these constituents, but no strong conclusions can be drawn from this program for at least two reasons: (1) this was a one-time sampling event, so there is no comparative data to determine whether these streets always have higher levels than the others, or whether this changes from time to time, and (2) it is virtually impossible to get directly comparable samples for analysis, due to the wide variety of debris that is collected in the sweeper bin, and the difficulty in removing that material for purposes getting truly representative samples. The usefulness of this BMP cannot be determined at this point, but the entities in which the sampling program was carried out will be considering modifications to their sweeping programs to see if more frequent sweeping in these areas will reduce the levels of these constituents in the next First Flush sampling event.

At this point the BMP was successful at Levels 1 and 2. It will only be known if it was successful at Level 4 if modifications to the sweeping programs are made and data from the First Flush events becomes available.

BMP 6-7.a Provide designated area for all vehicle maintenance. All of the entities that perform vehicle maintenance already had designated areas within which to perform this work.

The BMP was successful at Levels 1 and 2, but since it was already in place before the advent of the MRSWMP, it was probably not successful beyond those levels.

BMP 6-7.b Move maintenance and repair activities indoors or under a covered area whenever possible. All of the entities that perform vehicle maintenance already had indoor areas within which to perform this work. The BMP was successful at Levels 1 and 2, but since it was already in place before the advent of the MRSWMP, it was probably not successful beyond those levels.

BMP 6-7.e Using the Vehicle Service Facilities Inspection Checklist contained on pages E-71 through E-77 of Appendix E of the MRSWMP, inspect the MS4's vehicle maintenance facilities annually and correct any deficiencies noted. Use of the Checklist identified a number of items that the vehicle maintenance supervisors in each entity became more aware of in terms of reducing storm water pollution from these activities. While the inspections found that the vast majority of the checklist items were being complied with, some corrective actions were identified and carried out. This BMP was successful at Levels 1, 2, and 3.

BMP 6-7.f Store materials and wastes under cover whenever possible. All of the entities that perform vehicle maintenance already had properly covered material and waste storage areas, and most of them had waste materials promptly removed to proper disposal sites. The BMP was successful at Levels 1 and 2, but since it was already in place before the advent of the MRSWMP, it was probably not successful beyond those levels.

BMP 6-7.g Train all employees repairing municipal vehicles on proper pollution prevention techniques. The comments under BMP 6-1.a are applicable to this BMP as well. This BMP was successful at Levels 1, 2, and 3.

BMP 6-8.b Using the vehicle washing portion of the Vehicle Service Facilities Inspection Checklist contained on pages E-75 through E-76 of Appendix E of the MRSWMP, inspect the MS4's vehicle washing facilities annually and correct any deficiencies noted. Use of the Checklist identified a number of items that the supervisors in each entity whose duties include vehicle washing became more aware of in terms of reducing storm water pollution from these activities. While the inspections found that the vast majority of the checklist items were being complied with, some corrective actions were identified and carried out. This BMP was successful at Levels 1, 2, and 3.

BMP 6-9.a Require bridge and street maintenance contractors to regularly sweep construction zones and to keep paint and other construction materials out of the storm drain system. (Perform additional sweeping in conjunction with street and bridge maintenance work that is performed in-house.) All of the entities that perform this type of work already had contract language in their bid documents for these types of contracts. The BMP was successful at Levels 1 and 2, but since it was already in place before the advent of the MRSWMP, it was probably not successful beyond those levels.

BMP 6-10.a Stencil catch basins and inlets as needed as prevention measure. The comments under BMP 2-2.c are applicable to this BMP as well. This BMP was successful at Levels 1, 2, and 3.

BMP 6-10.b Inspect catch basins and inlets in the designated "hot spots" listed on page E-199 of Appendix E of the MRSWMP annually prior to rainy season, and clean as necessary. Some of the entities already had this as a standard-operating-procedure, while others did not. All of the entities have now adopted this procedure. Some of the inlets were found to be in need of cleaning when these inspections were conducted, so performing that cleaning can be assumed to have been effective in reducing the amount of pollutants that were discharged when the first rains of the season occurred. This BMP was successful at Levels 1, 2, 3, and 4.

BMP 6-10.c Clean and repair catch basins, inlets and piping as identified through inspections prior to November 1st annually. All of the entities already had an inspection program in place to determine when cleaning and repairs were needed, prior to the advent of the MRSWMP. The entities typically performed these inspections during the dry season, so any repairs could be performed at that time, prior to the time of year when the inlets and piping would be in use. Depending on workloads and the amount of repair work that is needed, it is not always possible to complete this work by November 1 each year. Normally, however, the repair work is fairly minor, so it can normally be performed shortly after the inspections are done. This BMP was successful at Levels 1, 2, and 4.

BMP 6-10.d Re-inspect identified problem areas of debris accumulation during wet season. All of the entities already had an inspection program in place, based on previously identified "problem areas" to perform followup inspections during the rainy season, prior to the advent of the MRSWMP. The entities typically performed these followup inspections based on localized flooding problems that in some cases were the result of wind-blown debris, e.g. leaves and pine needles that blind the inlet grates and restrict the flow of storm water into the underground piping systems. In only a few cases is actual cleaning of the catch basin itself necessary during the rainy season, because the pre-season cleaning removes the dry weather accumulation of debris, and the flushing action of flows during the rain events keeps the basins relatively free of such debris. This BMP was successful at Levels 1 and 2.

BMP 6-10.e Keep documentation of inspections and cleanings. Each entity has its own maintenance management system. Some systems are manually maintained via such things as log sheets, forms, logbooks, calendar entries, and other types of reminders and tracking entries done in hard copy form. Other systems are computer based and generate maintenance work orders and other types of reminders to perform certain scheduled maintenance activities such as catch basin cleaning. Regardless of the type of system being used, each entity performs regular maintenance of its storm drainage system components, and keeps track of problem areas and problem-causing circumstances. These include such events as heavy winds (which generate large amounts of leaf and pine needle debris) and heavy rains (which may produce localized flooding in low lying or debris prone areas). These systems have proven to be effective in preventing major problems within the storm drainage system, and have in turn helped to reduce the discharge of pollutants from the outfalls of these systems. This BMP has been successful at Levels 1, 2, and 4.

BMP 6-10.f Twice during the 5-year permit period, perform an analysis for pollutants of concern in material removed from catch basins by cleaning. This was the first year for performance of this BMP. The required analyses were performed during the current reporting

period. The sampling locations for these analyses were picked based on the findings of the First Flush monitoring program that has been conducted for several years, and continues being conducted. That program identified the drainage areas within the MRSWMP permit boundary that had the highest levels of constituents that might typically be removed by catch basin cleaning, which in this instance were determined to be metals, *E. Coli*, and enterococcus. Four samples were collected within each of the two drainage areas having the highest recurring levels of these constituents. These were both located in the city of Monterey.

The results of this sampling program served to identify the catch basins within those drainage areas that appeared to have the highest levels of these constituents, but no strong conclusions can be drawn from this program for at least two reasons: (1) this was a one-time sampling event, so there is no comparative data to determine whether these catch basins always have higher levels than the others, or whether this changes from time to time, and (2) it is virtually impossible to get directly comparable samples for analysis, due to the wide variety of debris that is collected in the catch basins, and the difficulty in removing that material for purposes getting truly representative samples. The usefulness of this BMP cannot be determined at this point, but the entities in which the sampling program was carried out will be considering modifications to their catch basin cleaning programs to see if the levels of these constituents can be reduced in the next First Flush sampling event.

At this point the BMP was successful at Levels 1, 2, and 3. It will only be known if it was successful at Level 4 if modifications to the catch basin cleaning programs are made and data from the First Flush events becomes available.

BMP 6-11.a Regularly inspect and clean trash enclosures. Each entity performed these inspections and cleanings on a regular basis. By removing trash and other debris from these areas, the amount of such material that entered the storm drainage system was reduced. All of the entities previously performed regular cleaning of these facilities, so this BMP was successful at Levels 1, 2, and 4.

BMP 6-11.b Regularly inspect and clean parks. Each entity performed these inspections and cleanings on a regular basis. By removing trash and other debris from parks, the amount of such material that entered the storm drainage system was reduced. All of the entities previously performed regular cleaning of their parks, so this BMP was successful at Levels 1, 2, and 4.

The table below summarizes the effectiveness of each of the BMPs carried out under MCM No. 6.

EFFECTIVENESS ASSESSMENT SUMMARY FOR MCM NO. 6
POLLUTION PREVENTION / GOOD HOUSEKEEPING PRACTICES
FOR MUNICIPAL OPERATIONS
FOR THE CURRENT REPORTING PERIOD

BMP	Effectiveness Assessment Outcome Levels			
	Level 1	Level 2	Level 3	Level 4
	Implement Program	Increase Awareness	Behavior Change	Load Reductions
6-1.a Training (General)	X	X	X	
6-2.a Hazardous Materials	X	X	X	
6-3.a Training (Used Motor Oil)	X	X	X	
6-3.b Used Motor Oil Disposal	X	X	X	
6-4.a Training (Landscape Management)	X	X		
6-4.b Landscape Spraying	X	X	X	
6-5.a Disposal of Swimming Pool Water	X	X		
6-6.a Street Sweeping	X			X
6-6.b Analysis of Street Sweeping Materials	X	X		
6-7.a Designated Vehicle Maintenance Areas	X	X		
6-7.b Vehicle Maintenance Performed Indoors	X	X		
6-7.e Inspect Vehicle Service Facilities	X	X	X	

BMP	Effectiveness Assessment Outcome Levels			
	Level 1	Level 2	Level 3	Level 4
	Implement Program	Increase Awareness	Behavior Change	Load Reductions
6-7.f Covered Storage for Materials & Wastes	X	X		
6-7.g Training (Vehicle Maintenance)	X	X	X	
6-8.b Inspect Vehicle Washing Facilities	X	X	X	
6-9.a Bridge and Road Maintenance Projects	X	X		
6-10.a Catch Basin Stenciling (Corporation Yards)	X	X	X	
6-10.b Catch Basin Inspections in Hot Spot Areas	X	X	X	X
6-10.c Clean & Repair Catch Basins	X	X		X
6-10.d Reinspect Problem Areas	X	X		
6-10.e Documentation	X	X		X
6-10.f Analysis of Catch Basin Cleaning Materials	X	X	X	
6-11.a Inspect Trash Enclosures	X	X		X
6-11.b Inspect Parks	X	X		X

Note: At this early stage of implementation of the MRSWMP, it is not expected that any of the BMPs will be able to demonstrate success above Level 4. Therefore, the summary table above only goes up to Level 4. In future Annual Reports, if any of the BMPs demonstrate success above Level 4, the table will be expanded to include higher levels.

E. Certification

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Monterey Regional Water Pollution Control Agency
Date Signed 11/14/08

Robert Jaques, Storm Water Program Manager

City of Pacific Grove
Date Signed: November 14, 2008

City of Monterey
Date Signed 11/14/08

Tom Reeves

Tom Reeves, City Engineer

City of Sand City
Date Signed 11/14/2008

Richard Simonitch, City Engineer

City of Seaside
Date Signed 14Nov08

Bjorn Lundegard, Public Works Superintendent

City of Del Rey Oaks
Date Signed Nov. 4 2008

Dewey Evans, City Manager

City of Marina
Date Signed 11-14-08

Anthony J. Altfeld, City Manager

County of Monterey
Date Signed NOV 9, 2008

Elizabeth Krafft, Program Manager

City of Carmel-by-the-Sea
Date Signed 11/14/08

Richard Guillen, City Administrator